

Indiana v. Edwards (2008)

Nature: Competency to stand trial and Self-representation

Facts: In July 1999, Mr. Edwards tried to steal a pair of shoes from an Indiana department store. After he was discovered, he fired his gun at a security guard and wounded a bystander. He was apprehended and charged with Attempted Murder, Battery with a Deadly Weapon, Criminal Recklessness, and Theft. Mr. Edwards underwent several competency hearings. At the first two competency hearings, the court concluded Mr. Edwards was incompetent to stand trial because he suffered from serious thinking difficulties and delusions. A psychiatrist reported he could understand the charges against him but was “unable to cooperate with his attorney in his defense because of his schizophrenic illness.” “His delusions and his marked difficulties in thinking make it impossible for him to cooperate with his attorney.” Therefore, he was committed to the state hospital for further evaluation and treatment. About eight months later, Mr. Edward’s condition had improved, and he underwent another competency evaluation. The trial judge ultimately ruled Mr. Edwards was competent to stand trial. Prior to the trial, Mr. Edwards asked to represent himself, which the trial court denied, and he was convicted of theft and criminal recklessness. Six months later, he was retried and petitioned the court again to represent himself. The trial judge denied his self-representation request and stated, “He’s competent to stand trial, but I am not going to find that he’s competent to defend himself.” He was convicted of attempted murder and battery. Mr. Edwards filed an appeal, arguing that his constitutional right to self-representation was violated. The appellate court agreed with Mr. Edwards and ordered a new trial. The matter then went to the Indiana Supreme Court. At Indiana’s request, the Supreme Court agreed to consider whether the Constitution required the trial court to allow Mr. Edwards to represent himself at trial.

Issues: Can the State deny the right of self-representation to those who are deemed competent to stand trial?

Holdings/Rationale: Yes- The Court argued three main points in its rationale:

1) The case of Dusky and Drope was utilized to illustrate the standards of competency and the assistance of counsel and were not aimed for competency of self-representation. Although Faretta granted the right to proceed pro se so long and the decision was made “voluntarily and

intelligently,” this right is not absolute and a standard of competence was addressed at that time. In addition, the Court’s decision in *Godinez* did not provide a standard of competence for self-representation, because the ability to conduct a defense at trial was not at issue in the case.

2) The Court noted the nature of mental illness can vary in degrees and over time, and can interfere with a defendant’s functioning in different ways at different intervals. The nature of mental illness does not allow for a unitary standard of competency to stand trial and competency to represent oneself. The Court also referred to an APA brief filed in support of neither party that “disorganized thinking, deficits in sustaining attention, and severe mental illness can impair the defendant’s ability to play the significantly expanded role required for self-representation, even if he can play the lesser role of represented defendant.

3) The Court noted a right to self-representation at trial will not “affirm the dignity” of a defendant who lacks the mental capacity to conduct his defense without the assistance of counsel. This also threatened an improper conviction or sentence and undercut the most basic of the Constitution’s criminal law objectives: providing a fair trial.

Implications: Court may ask the evaluators to provide an opinion on a defendant’s ability to proceed pro se. In such instances, it will be important to assess for both Dusky-based competencies, as well as the defendant’s ability to carry out basic defense related to self-representation.