

SUPREME COURT OF IOWA

State v. Sweet

879 N.W.2d 811 (Iowa 2016) · Decided May 27, 2016

SUMMARY

The Iowa Supreme Court considered whether sentencing a juvenile offender convicted of first-degree murder to life imprisonment without the possibility of parole violated article I, section 17 of the Iowa Constitution. Applying principles concerning juvenile sentencing and the Miller/Ragland factors, the court reversed the sentence and remanded for resentencing because the district court did not properly apply the constitutional standard.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Appel, Justice; Appel; Cady; Files; Hecht; Mansfield; Waterman; Wiggins; Zager
JURISDICTION	Iowa
DECIDED	May 27, 2016
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Sweet pleaded guilty to two counts of first-degree murder pursuant to an agreement that the State would recommend concurrent sentences. After a sentencing hearing, the district court imposed life imprisonment without the possibility of parole. Sweet appealed the sentence on constitutional grounds.
STANDARD OF REVIEW	De novo review applies to constitutional challenges to sentences, including Miller-type claims.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion; precedential.
PARTIES	Isaiah Sweet v. State of Iowa

TOPICS

- cruel and unusual punishment
- sentencing
- criminal procedure
- constitutional law
- fourteenth amendment

PRACTICE AREAS

- criminal law
- constitutional law
- juvenile sentencing

QUESTIONS PRESENTED

1. Whether article I, section 17 of the Iowa Constitution categorically prohibits sentencing a juvenile offender to life imprisonment without the possibility of parole.
2. Whether the district court could constitutionally impose life without parole on Sweet based on its finding that his murders were premeditated, horrific, and demonstrated an ongoing threat to society.
3. What standard of review applies to a constitutional challenge to a juvenile life-without-parole sentence.

HOLDINGS

1. Article I, section 17 of the Iowa Constitution categorically prohibits sentencing juvenile offenders to life imprisonment without the possibility of parole.
2. Sweet's sentence of life imprisonment without the possibility of parole violated article I, section 17 of the Iowa Constitution and could not stand.
3. A constitutional challenge to a sentence, including a Miller-type claim, is reviewed de novo.

KEY QUOTATIONS

“In short, we are asking the sentencer to do the impossible, namely, to determine whether the offender is “irretrievably corrupt” at a time when even trained professionals with years of clinical experience would not attempt to make such a determination.” (at 837)

“For the above reasons, we adopt a categorical rule that juvenile offenders may not be sentenced to life without the possibility of parole under article I, section 17 of the Iowa Constitution.” (at 839)

“For the above reasons, we conclude a sentence of life without the possibility of parole for a juvenile offender violates article I, section 17 of the Iowa Constitution.” (at 840)

FACTUAL BACKGROUND

Seventeen-year-old Isaiah Sweet shot and killed his grandparents, Richard and Janet Sweet, who had cared for him since he was approximately four years old. Sweet described a tumultuous family environment, significant substance abuse, mental-health and behavioral concerns, poor educational performance, impulsivity, and prior juvenile difficulties. He pleaded guilty to two counts of first-degree murder and, after a sentencing hearing involving expert testimony about adolescent development and rehabilitation, received life imprisonment without the possibility of parole.

PROCEDURAL HISTORY

Sweet was charged with two counts of first-degree murder after killing his grandparents at age seventeen. He pleaded guilty under an agreement concerning concurrent sentences, and the district court conducted a sentencing hearing addressing his youth and the state of the law. The district court concluded that this was a rare case warranting life without parole. The Iowa Supreme Court reversed and remanded for resentencing.

DISPOSITION

REMAND INSTRUCTIONS

Vacate the life-without-parole sentence and remand to the district court for resentencing consistent with the opinion. The new sentence may not impose life imprisonment without the possibility of parole on the juvenile offender.

CASES CITED

- Miller v. Alabama, Miller v. Alabama, 567 U.S. 460 (2012)
- Graham v. Florida, Graham v. Florida, 560 U.S. 48 (2010)
- Roper v. Simmons, 543 U.S. 551 (2005)
- Montgomery v. Louisiana, 577 U.S. 190 (2016)
- State v. Seats, 865 N.W.2d 545 (Iowa 2015)
- State v. Lyle, 854 N.W.2d 378 (Iowa 2014)
- State v. Ragland, 836 N.W.2d 107 (Iowa 2013)
- State v. Null, 836 N.W.2d 41 (Iowa 2013)
- State v. Pearson, 836 N.W.2d 88 (Iowa 2013)
- State v. Bruegger, 773 N.W.2d 862 (Iowa 2009)
- Penry v. Lynaugh, 492 U.S. 302 (1989)
- Atkins v. Virginia, 536 U.S. 304 (2002)
- Stanford v. Kentucky, 492 U.S. 361 (1989)
- Furman v. Georgia, 408 U.S. 238 (1972)
- Gregg v. Georgia, 428 U.S. 153 (1976)
- Woodson v. North Carolina, 428 U.S. 280 (1976)
- Coker v. Georgia, 433 U.S. 584 (1977)
- Enmund v. Florida, 458 U.S. 782 (1982)
- Eddings v. Oklahoma, 455 U.S. 104 (1982)
- State v. Louisell, 865 N.W.2d 590 (Iowa 2015)
- State v. Short, 851 N.W.2d 474 (Iowa 2014)
- State v. Ochoa, 792 N.W.2d 260 (Iowa 2010)