

SUPREME COURT OF ILLINOIS

People v. Roddis

2020 IL 124352 (Ill. 2020) · No. 124352 · Decided January 24, 2020

SUMMARY

The Illinois Supreme Court considers whether a trial court conducting a preliminary Krankel inquiry may assess both the factual and legal merits of a defendant’s pro se ineffective-assistance claim before deciding whether to appoint new counsel. The court holds that the trial court may consider the claim’s merits in their entirety, reverses the appellate court, and affirms the trial court’s judgment.

CASE DETAILS

COURT	Supreme Court of Illinois
WRITING FOR THE COURT	Justice Garman; Chief Justice Burke; Justice Thomas; Justice Kilbride; Justice Karmeier; Justice Theis; Justice Neville
JURISDICTION	Illinois
DECIDED	January 24, 2020
DOCKET	124352
DISPOSITION	reversed
PROCEDURAL POSTURE	The State appealed the appellate court's judgment reversing the circuit court's handling of defendant's pro se posttrial ineffective-assistance allegations and remanding for appointment of new counsel. The Illinois Supreme Court granted the State's petition for leave to appeal.
STANDARD OF REVIEW	De novo review applies to whether the trial court properly conducted a preliminary Krankel inquiry because the issue presents a legal question.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	The People of the State of Illinois v. Ryan M. Roddis

TOPICS

- ineffective assistance
- criminal procedure
- post-conviction relief
- appellate procedure
- standard of review

PRACTICE AREAS

- Criminal law
- Criminal procedure
- Ineffective assistance of counsel
- Appellate procedure

QUESTIONS PRESENTED

1. Whether a trial court conducting a preliminary Krankel inquiry may consider both the factual and legal merits of a defendant's pro se posttrial ineffective-assistance allegations when deciding whether to appoint new counsel.
2. Whether the circuit court adequately inquired into Roddis's allegations and properly declined to appoint new counsel.

HOLDINGS

1. At the preliminary inquiry stage, a trial court may consider both the factual and legal merits of a defendant's pro se posttrial allegations of ineffective assistance of counsel when determining whether to appoint new counsel.
2. The circuit court conducted an adequate inquiry into Roddis's allegations, and its decision not to appoint new counsel was proper because the allegations were either matters of trial strategy or unfounded.

KEY QUOTATIONS

“For the reasons discussed above, we hold that a trial court may consider both the facts and legal merits of a defendant’s pro se posttrial allegations of ineffective assistance of counsel at the preliminary inquiry stage.”

(¶ 70)

“Appellate court judgment reversed.” (¶ 71)

“Circuit court judgment affirmed.” (¶ 72)

FACTUAL BACKGROUND

Roddis was charged with aggravated domestic battery after Meghan Collins suffered a head laceration during an apartment altercation. At a bench trial, Collins testified that Roddis pushed her head into a door, while Roddis testified that a couch cushion accidentally struck her and denied intending to harm her. Roddis was convicted and sentenced to six years in prison. In his posttrial ineffective-assistance allegations, he primarily claimed that counsel failed to impeach Collins with text messages and that prior counsel induced him to waive a jury trial through improper representations.

PROCEDURAL HISTORY

Following a bench trial in the Circuit Court of Macon County, Roddis was convicted of aggravated domestic battery and sentenced to six years' imprisonment. His pro se motion for sentence reduction, which also alleged ineffective assistance of counsel, was dismissed as untimely. On the first appeal, the appellate court affirmed the conviction and sentence but remanded for a Krankel hearing. After the circuit court conducted a preliminary inquiry and declined to appoint new counsel, the appellate court reversed and remanded, holding that the trial court improperly reached the merits. The Illinois Supreme Court reversed the appellate court and affirmed the circuit court.

DISPOSITION

reversed

CASES CITED

- People v. Krankel, 102 Ill. 2d 181 (1984)
- People v. Jolly, 2014 IL 117142, ¶ 28
- People v. Ayres, 2017 IL 120071, ¶¶ 1, 11
- People v. Jocko, 239 Ill. 2d 87, 91-92 (2010)
- People v. Moore, 207 Ill. 2d 68, 77-79 (2003)
- People v. Chapman, 194 Ill. 2d 186, 196-201, 228-31 (2000)
- People v. Simms, 168 Ill. 2d 176, 199 (1995)
- People v. Sims, 167 Ill. 2d 483, 518 (1995)
- People v. Johnson, 159 Ill. 2d 97, 126 (1994)
- People v. Coleman, 158 Ill. 2d 319, 350-52 (1994)
- Miranda v. Arizona, 384 U.S. 436 (1966)