

UTAH COURT OF APPEALS

State v. Bridgewaters

2025 UT App 184 (Utah Ct. App. 2025) · No. Case No. 20221065-CA · Decided December 11, 2025

SUMMARY

The Utah Court of Appeals held that a trial court erred by denying Joshua Ryan Bridgewaters’s unequivocal request to represent himself without determining whether his waiver of counsel was knowing and intelligent. The court further held that dilatory conduct does not constitute an implied waiver of the right to self-representation absent a prior warning that such conduct would result in waiver. It vacated Bridgewaters’s convictions for manslaughter and witness tampering and remanded for a new trial.

CASE DETAILS

COURT	Utah Court of Appeals
WRITING FOR THE COURT	Judge John D. Luthy; Judge David N. Mortensen; Judge Amy J. Oliver
JURISDICTION	Utah Court of Appeals
DECIDED	December 11, 2025
DOCKET	Case No. 20221065-CA
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from conviction after jury trial; appellant challenged denial of request to proceed pro se
STANDARD OF REVIEW	Correction of error standard for legal standard applied; clearly erroneous for factual findings
PRECEDENTIAL VALUE	precedential
PARTIES	Joshua Ryan Bridgewaters v. State of Utah

TOPICS

- right to counsel
- criminal procedure
- appellate procedure
- due process

PRACTICE AREAS

- criminal law
- constitutional law
- appellate practice

QUESTIONS PRESENTED

1. Whether the trial court violated defendant's right to self-representation by denying his request to proceed pro se without determining whether his waiver of counsel was knowing and intelligent
2. Whether a defendant can impliedly waive the right to self-representation through dilatory tactics without prior warning

HOLDINGS

1. Denial of a defendant's explicit request to proceed pro se constitutes error when the court fails to root that denial in a finding that the request was not knowingly and intelligently made.
2. A defendant cannot impliedly waive the right to self-representation through dilatory tactics or other similar misconduct unless the court first warns the defendant that such misconduct will constitute a waiver.

KEY QUOTATIONS

“We conclude that absent forfeiture or an implied waiver of the right to self-representation, denial of a defendant's explicit request to proceed pro se constitutes error when the court fails to root that denial in a finding that the request was not knowingly and intelligently made.” (¶ 2)

“We further conclude that a defendant cannot impliedly waive the right to self-representation through dilatory tactics or other similar misconduct unless the court first warns the defendant that such misconduct will constitute a waiver.” (¶ 2)

“Consideration of the defendant's best interests is not relevant to the determination of whether or not a knowing and intelligent waiver has been made.” (¶ 28)

FACTUAL BACKGROUND

Joshua Ryan Bridgewaters was charged with murder, obstruction of justice, and witness tampering related to his girlfriend's death. Before trial, he made multiple requests to represent himself. At the final hearing on April 14, 2022, the trial court denied his request without conducting a full Frampton colloquy, instead finding that proceeding pro se didn't 'make sense' and that Bridgewaters was using the request as a delay mechanism. Bridgewaters was represented by appointed counsel at trial and convicted of manslaughter and witness tampering.

PROCEDURAL HISTORY

Bridgewaters was charged with murder, obstruction of justice, and witness tampering. Before trial, he repeatedly requested to represent himself. The trial court denied his final request without conducting an adequate waiver colloquy, finding he was using the request as a delay mechanism. A jury convicted him of manslaughter and witness tampering. He appealed the denial of his pro se request.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Case is reversed and remanded for a new trial at which Bridgewaters may exercise his constitutional right to represent himself if he voluntarily, knowingly, and intelligently chooses to do so. The trial court is directed to conduct a colloquy on the record between the court and Bridgewaters to insure that he understands the risks of self-representation. The court is also encouraged to appoint standby counsel.

CASES CITED

- Faretta v. California, 422 U.S. 806 (1975)
- State v. Frampton, 737 P.2d 183 (Utah 1987)
- State v. Bakalov, 849 P.2d 629 (Utah Ct. App. 1993)
- State v. Bakalov, 862 P.2d 1354 (Utah 1993)
- State v. Pedockie, 2006 UT 28, 137 P.3d 716
- State v. Patton, 2023 UT App 33, 528 P.3d 1249
- State v. Jamieson, 2021 UT App 3, 480 P.3d 363
- State v. Von Ferguson, 2007 UT 1, 169 P.3d 423
- Richmond v. Bateman, 2024 UT App 103, 554 P.3d 341