

SUPREME COURT OF IOWA

State of Iowa v. Nathan Blake Watson

620 N.W.2d 233 (Iowa 2000) · No. No. 99-0264 · Decided January 2, 2001

SUMMARY

The Supreme Court of Iowa held that trial counsel had an actual conflict of interest because counsel and the public defender's office represented both the defendant and a key prosecution witness. The trial court knew or should have known of the conflict and was required to conduct a sua sponte hearing regarding the propriety of the representation. The court reversed the murder conviction and remanded for a new trial with conflict-free counsel.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Ternus, Justice; McGiverin, Senior Justice; Snell, Justice; McGiverin, Senior Justice, participating in place of Snell, Justice
JURISDICTION	Iowa
DECIDED	January 2, 2001
DOCKET	No. 99-0264
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Watson was convicted by a jury of first-degree murder and appealed, arguing that the trial court was required to inquire sua sponte into a conflict of interest arising from his defense counsel's simultaneous representation of Watson and a key prosecution witness.
STANDARD OF REVIEW	De novo review because the appeal presented a constitutional issue.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Nathan Blake Watson v. State of Iowa

TOPICS

- sixth amendment
- right to counsel
- criminal procedure
- appellate procedure
- ineffective assistance

PRACTICE AREAS

- criminal procedure
- constitutional law
- criminal defense
- legal ethics
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court had a sua sponte duty to inquire into a defense counsel's conflict of interest when the court knew or reasonably should have known that counsel simultaneously represented the defendant and a key prosecution witness.
2. Whether reversal was required without a separate showing that the conflict adversely affected counsel's performance when the trial court failed to conduct the required inquiry.
3. Whether representation by different attorneys within the same public defender's office eliminated the conflict of interest.

HOLDINGS

1. A trial court has a sua sponte duty to inquire into the propriety of defense counsel's representation when it knows or reasonably should know that a particular conflict of interest exists.
2. When an actual conflict existed, the trial court knew or should have known of it, and the court failed to inquire, reversal is required without a separate showing of prejudice.

KEY QUOTATIONS

"A trial court has the duty sua sponte to inquire into the propriety of defense counsel's representation when it knows or reasonably should know that a particular conflict exists." (at 238)

"We hold that the defendant's trial counsel had an actual conflict of interest that the trial court knew or should have known existed when the court became aware of counsel's dual representation of the defendant and a key prosecution witness." (at 241-242)

"Accordingly, we reverse the defendant's conviction and remand for a new trial where the defendant shall be represented by counsel unburdened by a conflict of interest." (at 242)

FACTUAL BACKGROUND

Nathan Watson lived with his father, Rocky Chase, who was shot in the forehead at close range with a shotgun. Watson claimed the shooting was accidental or self-inflicted, but the State charged him with first-degree murder. A prosecution witness, David Grunewald, testified that he overheard Watson say that demons made him shoot his father. During cross-examination, it became apparent that Watson's defense attorney, Tim Ross-Boon, had also represented Grunewald during the pretrial period when Grunewald reported Watson's statement and was sentenced on a contempt charge.

PROCEDURAL HISTORY

Watson was charged with first-degree murder after his father was shot and killed. A jury convicted him. No party objected at trial to defense counsel's representation of both Watson and prosecution witness David Grunewald, and the trial court did not initiate an inquiry. The Supreme Court of Iowa reversed the conviction and remanded for a new trial.

DISPOSITION

REMAND INSTRUCTIONS

The conviction was reversed and the case was remanded for a new trial at which Watson was to be represented by counsel unburdened by a conflict of interest.

CASES CITED

- State v. Vanover, 559 N.W.2d 618, 627 (Iowa 1997)
- Faretta v. California, 422 U.S. 806, 807 (1975)
- Powell v. Alabama, 287 U.S. 45, 58 (1932)
- Wheat v. United States, 486 U.S. 153, 159 (1988)
- Strickland v. Washington, 466 U.S. 668, 689 (1984)
- Glasser v. United States, 315 U.S. 60, 68-76 (1942)
- Holloway v. Arkansas, 435 U.S. 475, 488-90 (1978)
- Cuyler v. Sullivan, 446 U.S. 335, 347-48 (1980)
- Wood v. Georgia, 450 U.S. 261, 263-74 (1981)
- Castillo v. Estelle, 504 F.2d 1243, 1245 (5th Cir. 1974)
- Zuck v. Alabama, 588 F.2d 436, 440 (5th Cir. 1979)
- Atley v. Ault, 191 F.3d 865, 869 (8th Cir. 1999)
- State v. James, 433 S.E.2d 755, 757-58 (N.C. Ct. App. 1993)
- Cabello v. United States, 188 F.3d 871, 875 (7th Cir. 1999)
- United States v. Fish, 34 F.3d 488, 492 (7th Cir. 1994)
- State v. Jenkins, 898 P.2d 1121, 1129 (Kan. 1995)
- United States v. Martin, 965 F.2d 839, 842 (10th Cir. 1992)
- Smith v. Lockhart, 923 F.2d 1314, 1320 (8th Cir. 1991)
- State v. Atley, 564 N.W.2d 817, 834 (Iowa 1997)
- In re Saladin, 518 A.2d 1258, 1260-62 (Pa. Super. Ct. 1986)
- Porter v. United States, 298 F.2d 461, 463 (5th Cir. 1962)
- United States ex rel. Williamson v. LaVallee, 282 F. Supp. 968, 971 (E.D.N.Y. 1968)
- United States ex rel. Miller v. Myers, 253 F. Supp. 55, 57 (E.D. Pa. 1966)
- Okeani v. Superior Court, 871 P.2d 727, 728-29 (Ariz. Ct. App. 1994)
- People v. Coleman, 703 N.E.2d 137, 144 (Ill. App. Ct. 1998)
- Ross v. Heyne, 638 F.2d 979, 984-85 (7th Cir. 1980)