

SUPREME COURT OF IOWA

Martin Shane Moon v. State of Iowa

911 N.W.2d 137 (Iowa 2018) · No. No. 15–1815 · Decided April 20, 2018

SUMMARY

The Iowa Supreme Court reviewed Martin Shane Moon’s second postconviction-relief application, which alleged a Brady violation and newly discovered evidence based on a witness’s affidavit claiming he had made false statements implicating Moon. The court held that the three-year statute of limitations did not bar Moon’s substantive claims because the asserted ground of fact could not clearly have been raised earlier and had a sufficient nexus to his conviction. Nevertheless, the court concluded that Moon failed to establish a Brady violation or a viable newly discovered evidence claim, vacated the court of appeals’ decision, and affirmed the district court’s summary dismissal.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Wiggins, Justice
JURISDICTION	Iowa
DECIDED	April 20, 2018
DOCKET	No. 15–1815
DISPOSITION	vacated
PROCEDURAL POSTURE	Further review of a Iowa Court of Appeals decision affirming summary dismissal of Moon's second postconviction-relief application.
STANDARD OF REVIEW	Postconviction proceedings are generally reviewed for errors at law, but constitutional claims are reviewed de novo. Because the district court summarily disposed of the application under Iowa Code section 822.6, the court applied summary-judgment standards, viewing the record in the light most favorable to the nonmoving party and drawing legitimate inferences in that party's favor.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion
PARTIES	Martin Shane Moon v. State of Iowa

TOPICS

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QUESTIONS PRESENTED

1. Whether Iowa Code section 822.3's three-year postconviction-relief statute of limitations barred Moon's Brady and newly discovered evidence claims.
2. Whether Boone's affidavit and related information constituted a ground of fact that could not have been raised within the limitations period and had a nexus to Moon's conviction.
3. Whether the State's alleged suppression of information concerning Boone's statements established a Brady violation.
4. Whether Boone's affidavit satisfied Iowa's requirements for newly discovered evidence.

HOLDINGS

1. The limitations period did not bar Moon's substantive claims because genuine issues of material fact existed as to whether he could have discovered the asserted ground of fact earlier, and the asserted evidence had the potential to qualify as material evidence connected to his conviction.
2. Moon failed to establish a Brady violation because, even assuming suppression and favorability, the alleged evidence was not material to the issue of guilt; there was no reasonable probability that disclosure would have changed the trial outcome.
3. Moon failed to establish a viable newly-discovered-evidence claim because the evidence was merely impeaching rather than material and probably would not have changed the result of the trial.
4. The Iowa Court of Appeals decision was vacated, and the Iowa District Court judgment summarily dismissing Moon's postconviction-relief application was affirmed.

KEY QUOTATIONS

"We explicitly and "specifically reject[ed] any requirement that an applicant must show the ground of fact would likely or probably have changed the outcome of the underlying criminal case in order to avoid a limitations defense." (p. 10)

"We conclude even if the State had disclosed to Moon the alleged interference on the part of Brodsack and the defense had used the information to impeach Brodsack's testimony, there is no reasonable probability that the outcome of trial would have been different." (p. 24)

"In sum, because no genuine issue of material fact exists on two of the elements needed for a successful newly-discovered-evidence claim, the State is entitled to a judgment as a matter of law on Moon's newly-discovered-evidence claim." (p. 29)

FACTUAL BACKGROUND

In 1990, Kevin Dickson was shot and killed. At Moon's 2000 murder trial, codefendant Casey Brodsack testified that Moon participated in the killing, and other witnesses and physical evidence corroborated significant portions of Brodsack's account. Before trial, the State identified Brandon Lee Boone as a potential witness concerning an alleged prison-yard confession by Moon, but Boone did not testify. In a 2011 affidavit, Boone asserted that he had made false statements to law enforcement at Brodsack's direction and that law enforcement had ignored his attempts to convey that the statements were false.

PROCEDURAL HISTORY

Moon was convicted of first-degree murder in 2000 and sentenced to mandatory life imprisonment. His direct appeal and first postconviction-relief proceeding were unsuccessful. He filed a second postconviction-relief application in 2012 and later amended it to assert a Brady violation and newly discovered evidence based on Boone's 2011 affidavit. The district court summarily dismissed the application as untimely and meritless; the Iowa Court of Appeals affirmed; the Supreme Court of Iowa granted further review, vacated the court of appeals decision, and affirmed the district court judgment.

DISPOSITION

vacated

CASES CITED

- Brady v. Maryland, 373 U.S. 83, 87 (1963)
- Castro v. State, 795 N.W.2d 789, 792 (Iowa 2011)
- Everett v. State, 789 N.W.2d 151, 155 (Iowa 2010)
- Bugley v. State, 596 N.W.2d 893, 895 (Iowa 1999)
- State v. Johnson, 784 N.W.2d 192, 197 (Iowa 2010)
- Schmidt v. State, ___ N.W.2d ___ (Iowa 2018)
- Manning v. State, 654 N.W.2d 555, 559–60 (Iowa 2002)
- C & J Vantage Leasing Co. v. Wolfe, 795 N.W.2d 65, 73 (Iowa 2011)
- Eggiman v. Self-Insured Servs. Co., 718 N.W.2d 754, 758 (Iowa 2006)
- Vossoughi v. Polaschek, 859 N.W.2d 643, 649–55 (Iowa 2015)
- Harrington v. State, 659 N.W.2d 509, 515–24 (Iowa 2003)
- Aguilera v. State, 807 N.W.2d 249, 254–58 (Iowa 2011)
- United States v. Bagley, 473 U.S. 667, 676, 682–84 (1985)
- Cornell v. State, 430 N.W.2d 384, 386–87 (Iowa)
- State v. Anderson, 410 N.W.2d 231, 232–34 (Iowa 1987)
- State v. Romeo, 542 N.W.2d 543, 551–52 (Iowa 1996)
- Strickler v. Greene, 527 U.S. 263, 290 (1999)
- Rowe v. Grizzard, 591 F. Supp. 389, 397 (E.D. Va. 1984)
- Jones v. State, 479 N.W.2d 265, 274 (Iowa 1991)

- Jones v. Scurr, 316 N.W.2d 905, 906–10 (Iowa 1982)
- State v. Compiano, 261 Iowa 509, 519–20, 154 N.W.2d 845, 850–51 (1967)
- Westergard v. Des Moines Ry., 243 Iowa 495, 500, 503, 52 N.W.2d 39, 43–44 (1952)
- Boss v. Ludwick, 863 F. Supp. 2d 845, 859 (N.D. Iowa 2012)

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