

SUPERIOR COURT OF THE STATE OF DELAWARE

State v. Sharp

Sharp · No. ID No. 2010002207 · Decided March 4, 2026

SUMMARY

The Delaware Superior Court denied Noah Sharp’s motion for postconviction relief and granted appointed counsel Patrick J. Collins’s motion to withdraw. The court held that Sharp’s non-ineffective-assistance claims were procedurally barred under Superior Court Criminal Rule 61 and that his ineffective-assistance claims failed because he did not establish prejudice in light of the strong evidence supporting his convictions.

CASE DETAILS

COURT	Superior Court of the State of Delaware
WRITING FOR THE COURT	Ferris W. Wharton
JURISDICTION	Delaware Superior Court
DECIDED	March 4, 2026
DOCKET	ID No. 2010002207
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Noah Sharp moved for postconviction relief under Delaware Superior Court Criminal Rule 61 after his convictions for first-degree murder, possession of a deadly weapon during the commission of a felony, and first-degree conspiracy were affirmed on direct appeal. Appointed postconviction counsel moved to withdraw after concluding that the claims lacked merit.
STANDARD OF REVIEW	The court first applies the procedural bars in Superior Court Criminal Rule 61(i) before reaching the merits. An ineffective-assistance claim requires proof of deficient performance and resulting prejudice under Strickland v. Washington; failure to establish either prong is dispositive.
PRECEDENTIAL VALUE	Published Delaware Superior Court opinion
PARTIES	State of Delaware v. Noah Sharp

TOPICS

state post-conviction relief

post-conviction relief

ineffective assistance

criminal procedure

sixth amendment

PRACTICE AREAS

criminal law

postconviction relief

ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether Sharp's non-ineffective-assistance claims were procedurally barred under Superior Court Criminal Rule 61(i)(3) or Rule 61(i)(4).
2. Whether Sharp established ineffective assistance of counsel based on alleged failures to investigate DNA evidence, the codefendant's mental health and statements, potential defenses, and mitigating evidence.
3. Whether appointed postconviction counsel should be permitted to withdraw after concluding that Sharp's claims were without merit.

HOLDINGS

1. Sharp's claims other than ineffective assistance of counsel and the juror claim were procedurally defaulted under Rule 61(i)(3) because they were not raised in the proceedings leading to judgment and Sharp did not show cause and prejudice. The juror claim was barred under Rule 61(i)(4) because it had been previously adjudicated at trial and on direct appeal.
2. Sharp failed to establish ineffective assistance of counsel because his allegations were conclusory and, in light of the overwhelming evidence, did not show a reasonable probability that the alleged errors affected the outcome of the trial.
3. Appointed counsel was permitted to withdraw after conscientiously reviewing the record and determining that Sharp's postconviction claims lacked merit.

KEY QUOTATIONS

“Before addressing the merits of a defendant’s motion for postconviction relief, the Court must first apply the procedural bars of Superior Court Criminal Rule 61(i).” (at 9)

“A successful Sixth Amendment claim of IAC requires a showing “that there is a reasonable probability that, but for counsel’s unprofessional errors, the result of the proceeding would have been different.”” (at 10)

“The State’s case was so strong that there is no reasonable probability that, but for counsel’s alleged unprofessional errors, the result of the trial would have been different.” (at 11-12)

FACTUAL BACKGROUND

Sharp was convicted of murdering Madison Sparrow, possessing a deadly weapon during the felony, and conspiring with Annika Stalczynski. The evidence included communications discussing the murder and disposal of Sparrow's body, surveillance showing Sharp with a baseball bat near the woods, physical evidence near the burial site, Stalczynski's testimony, and Sharp's videotaped confession and assistance in locating the body.

Sharp's postconviction allegations concerned counsel's investigation of DNA and Stalczynski's mental health, alleged judicial bias, juror knowledge of the case, police and prosecutorial misconduct, interrogation, and alleged mitigating mental-health evidence.

PROCEDURAL HISTORY

A jury convicted Sharp in October 2022, and he was sentenced to life imprisonment plus twenty-eight years. His direct appeal was unsuccessful. Sharp filed a pro se motion for postconviction relief on August 20, 2024; counsel was appointed, and appointed counsel later moved to withdraw under Rule 61(e)(7). The Superior Court denied the postconviction motion and granted counsel's motion to withdraw.

DISPOSITION

other

CASES CITED

- Sharp v. State, 2024 WL 3251586 (Del. 2024)
- Younger v. State, 580 A.2d 552, 554 (Del. 1990)
- Strickland v. Washington, 466 U.S. 668, 667-68, 688-89, 694, 697 (1984)
- Wright v. State, 671 A.2d 1353, 1356 (Del. 1996)
- Dawson v. State, 673 A.2d 1186, 1196 (Del. 1996)
- Ploof v. State, 75 A.3d 811, 825 (Del. 2013)