

SUPREME COURT OF MINNESOTA

Jacob Stephen Brown v. State of Minnesota

863 N.W.2d 781 (Minn. 2015) · No. A14-1542 · Decided May 20, 2015

SUMMARY

The Minnesota Supreme Court affirmed the summary denial of Jacob Stephen Brown’s fifth petition for postconviction relief. The court held that the petition was time-barred under Minn. Stat. § 590.01, subd. 4(a), and that Brown failed to satisfy the mental-disease, newly-discovered-evidence, or interests-of-justice exceptions. The court did not reach the alternative procedural-bar issue under State v. Knaffla.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	Dietzen, Justice
JURISDICTION	Minnesota
DECIDED	May 20, 2015
DOCKET	A14-1542
DISPOSITION	affirmed
PROCEDURAL POSTURE	Brown appealed the summary denial of his fifth petition for postconviction relief. He argued that his guilty pleas should be withdrawn because they were involuntary and that his petition was exempt from the statutory limitations period under the mental-disease, newly-discovered-evidence, and interests-of-justice exceptions.
STANDARD OF REVIEW	The denial of postconviction relief is reviewed for abuse of discretion. Legal issues are reviewed de novo, while factual findings are reviewed for sufficient record support and will not be reversed unless clearly erroneous. A postconviction court may summarily deny a petition when the files and records conclusively establish that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Jacob Stephen Brown v. State of Minnesota

TOPICS

state post-conviction relief

successive petitions

actual innocence

post-conviction relief

appellate procedure

PRACTICE AREAS

post-conviction relief

criminal procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether Brown's fifth postconviction petition was barred by the two-year limitations period in Minn. Stat. § 590.01, subd. 4(a).
2. Whether Brown satisfied the mental-disease exception in Minn. Stat. § 590.01, subd. 4(b)(1).
3. Whether Brown satisfied the newly-discovered-evidence exception in Minn. Stat. § 590.01, subd. 4(b)(2) by presenting clear and convincing evidence of actual innocence.
4. Whether Brown satisfied the interests-of-justice exception in Minn. Stat. § 590.01, subd. 4(b)(5).
5. Whether the postconviction court properly summarily denied the petition without an evidentiary hearing.

HOLDINGS

1. Brown's fifth petition was filed outside the applicable limitations period and was time-barred unless one of the statutory exceptions applied.
2. Brown did not establish that a physical disability or mental disease precluded him from timely asserting his claim.
3. Brown did not satisfy the newly-discovered-evidence exception because the documents he submitted did not establish his actual innocence by clear and convincing evidence.
4. Brown did not satisfy the interests-of-justice exception because he failed to establish an injustice that caused him to miss the postconviction deadline.
5. The postconviction court properly summarily denied the petition because the record conclusively showed that Brown's claim was time-barred and did not satisfy any statutory exception.

KEY QUOTATIONS

"In sum, the record conclusively shows that Brown's claim fails to satisfy any of the exceptions in Minn. Stat. § 590.01, subd. 4(b), and therefore his fifth request for postconviction relief is time-barred under Minn. Stat. § 590.01, subd. 4(a)." (at 12)

"The exception is triggered by an injustice that caused the petitioner to miss the primary postconviction deadline, not the substantive merits of the petition." (at 10)

FACTUAL BACKGROUND

Brown pleaded guilty in 1988 to murdering his estranged girlfriend and attempting to murder her friend, receiving consecutive sentences of life imprisonment and 130 months. In his fifth postconviction petition, he claimed that mental illness rendered his pleas involuntary and relied on four documents, including psychiatric

and medical reports and a former counsel's affidavit. The documents did not establish that a mental disease prevented him from timely asserting the claim or that he was actually innocent.

PROCEDURAL HISTORY

Brown pleaded guilty in 1988 to first-degree murder and attempted first-degree murder and received consecutive sentences of life imprisonment and 130 months. His first postconviction petition resulted in concurrent sentences, but the denial of plea withdrawal was affirmed. His second, third, and fourth postconviction petitions were denied or affirmed, including a prior rejection of his competency-based plea challenge. The postconviction court summarily denied his fifth petition as time-barred and reaffirmed that ruling after considering a supplemental report; the Minnesota Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Knaffla, 309 Minn. 246, 252, 243 N.W.2d 737, 741 (1976)
- Brown v. State, 449 N.W.2d 180, 182-83 (Minn. 1989)
- Brown v. State, 481 N.W.2d 852, 852-53 (Minn. 1992)
- Brown v. State, 746 N.W.2d 640, 641-42 (Minn. 2008)
- Riley v. State, 819 N.W.2d 162, 167, 170-71 (Minn. 2012)
- Rickert v. State, 795 N.W.2d 236, 239 (Minn. 2011)
- Reed v. State, 793 N.W.2d 725, 729 (Minn. 2010)
- James v. State, 699 N.W.2d 723, 727 (Minn. 2005)
- State v. Coles, 2015 WL 1652901, at *5 (Minn. Apr. 15, 2015)
- Erickson v. State, 842 N.W.2d 314, 318 (Minn. 2014)
- Scherf v. State, 788 N.W.2d 504, 508 (Minn. 2010)
- Gassler v. State, 787 N.W.2d 575, 583, 586 (Minn. 2010)
- Miles v. State, 800 N.W.2d 778, 783 (Minn. 2011)
- Sanchez v. State, 816 N.W.2d 550, 557 (Minn. 2012)