

SUPREME COURT OF THE STATE OF MONTANA

State v. Mayes

385 Mont. 411 (2016) · No. DA 15-0371 · Decided November 29, 2016

SUMMARY

The Montana Supreme Court held that Jack Dean Mayes was denied his constitutional right to a speedy trial. The Court concluded that the State's unexplained 102-day delay in submitting evidence for laboratory analysis, combined with the length and nature of the prosecution and Mayes's lost access to drug rehabilitation and community-placement programs, outweighed the other factors. The Court reversed the district court's denial of Mayes's motion to dismiss and remanded for dismissal of the charges.

CASE DETAILS

COURT	Supreme Court of the State of Montana
WRITING FOR THE COURT	Laurie McKinnon; James Jeremiah Shea; Michael E. Wheat; Patricia Cotter
JURISDICTION	Montana
DECIDED	November 29, 2016
DOCKET	DA 15-0371
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Mayes pleaded guilty to felony criminal possession of dangerous drugs while reserving the right to appeal the denial of his speedy-trial motion. The Montana Supreme Court reviewed the District Court's denial of the motion to dismiss.
STANDARD OF REVIEW	The Supreme Court reviewed the District Court's underlying factual findings for clear error and reviewed de novo whether a constitutional speedy-trial violation occurred.
PRECEDENTIAL VALUE	Published Montana Supreme Court opinion; precedential
PARTIES	Jack Dean Mayes v. State of Montana

TOPICS

- speedy trial
- criminal procedure
- appellate procedure
- remedies

PRACTICE AREAS

criminal law

criminal procedure

constitutional law

appellate procedure

QUESTIONS PRESENTED

1. Whether the State violated Mayes's constitutional right to a speedy trial by delaying prosecution for 279 days, including an unexplained 102-day delay in submitting evidence to the State Crime Lab.
2. Whether Mayes's inability to participate in available drug-treatment and rehabilitation programs because of the unresolved charges constituted prejudice from oppressive pretrial incarceration.
3. Whether Mayes's guilty plea waived or otherwise compromised his preserved speedy-trial claim.
4. What remedy applies upon a violation of the constitutional right to a speedy trial.

HOLDINGS

1. A speedy-trial claim merits analysis because at least 200 days elapsed between commencement of the speedy-trial period and resolution of the case; Mayes's 279-day period exceeded the threshold by 79 days.
2. The State's unexplained 102-day delay in submitting the controlled evidence to the crime laboratory weighed heavily against the State in the speedy-trial balancing analysis.
3. Mayes's guilty plea did not compromise his constitutional speedy-trial claim because he expressly reserved the right to appeal the denial of his speedy-trial motion.
4. The inability to participate in available drug-treatment and community-placement programs because of the unresolved charges constituted prejudice within the oppressive-pretrial-incarceration component of the speedy-trial analysis.
5. The State violated Mayes's right to a speedy trial under the Sixth and Fourteenth Amendments to the United States Constitution and Article II, Section 24, of the Montana Constitution.
6. The remedy for the speedy-trial violation is dismissal of the charges.

KEY QUOTATIONS

“A reviewing court must analyze a potential speedy trial violation by balancing four factors: (1) the length of the delay; (2) the reasons for the delay; (3) whether the accused asserted his right to a speedy trial; and (4) whether prejudice to the accused resulted from the delay.” (¶ 7)

“It would be a mistake to align these distinct constitutional interests—the right to a speedy trial; the relinquishment of the right to trial; and all other constitutional rights attendant to trial—such that relinquishment of one constitutional right would compromise others that are distinguishably different.” (¶ 13)

“We therefore reverse the District Court’s denial of Mayes’ motion to dismiss and remand for dismissal of the charges.” (¶ 26)

FACTUAL BACKGROUND

Mayes was arrested on August 7, 2014, and charged with felony possession of a syringe containing liquid that field-tested positive for methamphetamine. Although the State Crime Lab notified authorities four days after the arrest that the sample needed to be repackaged for testing, the State waited 102 days to submit it. Mayes remained in county jail for 279 days, during which the unresolved charges prevented him from entering rehabilitative and community-placement programs for which he had been prescreened and accepted.

PROCEDURAL HISTORY

The State charged Mayes with felony criminal possession of a syringe containing methamphetamine. The District Court continued the trial because of delayed crime-laboratory testing and denied Mayes's motion to dismiss for violation of the right to a speedy trial. Mayes then pleaded guilty, reserved his speedy-trial claim, and appealed. The Supreme Court reversed and remanded for dismissal of the charges.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the District Court's denial of Mayes's motion to dismiss and remand for dismissal of the charges.

CASES CITED

- State v. Ariegwe, 2007 MT 204, 338 Mont. 442, 167 P.3d 815
- State v. Velasquez, 2016 MT 216, 384 Mont. 447, 377 P.3d 1235
- Barker v. Wingo, 407 U.S. 514, 92 S. Ct. 2182 (1972)
- State v. Billman, 2008 MT 326, 346 Mont. 118, 194 P.3d 58
- State v. Betterman, 2015 MT 39, 378 Mont. 182, 342 P.3d 971
- Betterman v. Montana, 136 S. Ct. 1609 (2016)
- Doggett v. United States, 505 U.S. 647, 112 S. Ct. 2686 (1992)
- United States v. Macdonald, 456 U.S. 1, 102 S. Ct. 1497 (1982)
- State v. Butterfly, 2016 MT 195, 384 Mont. 287, 377 P.3d 1191
- State v. Redlich, 2014 MT 55, 374 Mont. 135, 321 P.3d 82
- State v. Zimmerman, 2014 MT 173, 375 Mont. 374, 328 P.3d 1132
- State v. Maloney, 2015 MT 227, 380 Mont. 244, 354 P.3d 611