

SUPREME COURT OF THE STATE OF DELAWARE

Aricidiacono v. State

125 A.3d 677 (Del. 2015) · No. No. 718, 2014 · Decided October 12, 2015

SUMMARY

The Delaware Supreme Court affirmed the Superior Court’s refusal to vacate the convictions or sentences of forty-five defendants who had pleaded guilty to drug offenses without knowing about misconduct and evidence-handling problems at the Office of the Chief Medical Examiner. The court held that the defendants had not shown that the OCME issues coerced or otherwise rendered their guilty pleas involuntary, particularly because they did not dispute their factual guilt or identify evidence-planting or improper conduct affecting their pleas.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	Leo E. Strine, Jr., Chief Justice; Holland, Justice; Vaughn, Justice
JURISDICTION	Delaware
DECIDED	October 12, 2015
DOCKET	No. 718, 2014
DISPOSITION	affirmed
PROCEDURAL POSTURE	Forty-five defendants appealed the Superior Court's denial of postconviction relief seeking to vacate their convictions or sentences after guilty pleas to drug offenses. They argued that their pleas were involuntary and constitutionally defective because they were unaware of misconduct and evidence-handling problems at the Office of the Chief Medical Examiner.
STANDARD OF REVIEW	The Supreme Court reviewed the Superior Court's denial of postconviction relief and the legal validity of the defendants' guilty pleas de novo; the opinion does not expressly state a separate standard-of-review formulation.
PRECEDENTIAL VALUE	Published, precedential opinion of the Supreme Court of Delaware
PARTIES	Desiree A. Aricidiacono, et al. v. State of Delaware

TOPICS

post-conviction relief

plea bargaining

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether defendants who pleaded guilty to drug offenses could vacate their convictions or sentences because they were unaware of serious evidence-handling problems and employee misconduct at the Office of the Chief Medical Examiner.
2. Whether the defendants' guilty pleas were involuntary under *Brady v. United States* because the defendants lacked knowledge of the OCME problems and allegedly would have negotiated differently had they known of them.

HOLDINGS

1. Defendants who freely admitted their guilt and did not show that OCME misconduct contributed to an unfair conviction, false plea, or other constitutional injustice are bound by their guilty pleas and may not vacate their convictions or sentences merely because they were unaware of the OCME's problems.
2. The defendants' pleas were not involuntary under *Brady* because they identified no threats, misrepresentations, improper promises, coercion, or other governmental conduct that induced false pleas or overbore their ability to make a rational choice between pleading guilty and proceeding to trial.

KEY QUOTATIONS

“The defendants here submitted no evidence to suggest a natural inference that any misconduct at the OCME (or lack of knowledge of that conduct) coerced or otherwise induced the defendants to falsely plead guilty.” (125 A.3d at 681)

“We do not share the view of these defendants that they can simply point to the publicly reported problems at the OCME and thereby avoid their voluntary acknowledgement that they committed crimes involving the illegal possession of narcotics and other illegal substances.” (125 A.3d at 683)

“Given these realities, there is no just basis to vacate their pleas or otherwise upset their sentences.” (125 A.3d at 685)

FACTUAL BACKGROUND

The defendants pleaded guilty after plea colloquies and admitted possessing illegal narcotics. A 2014 investigation revealed that some employees of Delaware's Office of the Chief Medical Examiner had stolen drug evidence and that the office had serious oversight and security deficiencies, including allegations of drylabbing, but no evidence-planting. The defendants did not claim that they were innocent, that their admissions were false, that the State knew of the misconduct when they pleaded, or that the State used coercion or improper promises. Thirty-five defendants pleaded before the OCME had tested the seized evidence, and the remaining defendants did not show that the misconduct materially affected their pleas.

PROCEDURAL HISTORY

The Delaware Superior Court, in consolidated proceedings, denied the defendants' motions for postconviction relief and held that they were bound by their guilty pleas. The Supreme Court of Delaware affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Absher, 2014 WL 7010788 (Del. Super. Dec. 3, 2014)
- Anzara Brown v. State, 117 A.3d 568 (Del. 2015)
- Ira Brown v. State, 108 A.3d 1201 (Del. 2015)
- State v. Ringgold, 2015 WL 3580742 (Del. Super. June 2, 2015)
- Brewer v. State, 2015 WL 4606541 (Del. July 30, 2015)
- Patrick L. Brown v. State, 2015 WL 3372271 (Del. May 22, 2015)
- Carrero v. State, 2015 WL 3367940 (Del. May 21, 2015)
- McMillan v. State, 2015 WL 3444673 (Del. May 27, 2015)
- State v. Irwin, 2014 WL 6734821 (Del. Super. Nov. 17, 2014)
- Brady v. United States, 397 U.S. 742 (1970)
- United States v. Ruiz, 536 U.S. 622 (2002)
- Ferrara v. United States, 456 F.3d 278 (1st Cir. 2006)