

SUPREME COURT OF PENNSYLVANIA

Commonwealth v. Peoples

599 Pa. 254 (Pa. 2008) (Pa. 2008) · No. Nos. 482 CAP, 483 CAP · Decided December 18, 2008

SUMMARY

The Supreme Court of Pennsylvania vacated the PCRA court’s order granting relief and remanded for further proceedings. The court directed the PCRA court to consider whether the petitioner’s proffer was sufficient to warrant a hearing, resolve disputed material facts through supported findings, address all properly presented claims, and proceed expeditiously.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Chief Justice Castille; Justice Saylor; Justice Eakin; Justice Baer; Justice Todd; Justice McCaffery; Justice Greenspan
JURISDICTION	Pennsylvania
DECIDED	December 18, 2008
DOCKET	Nos. 482 CAP, 483 CAP
DISPOSITION	vacated
PROCEDURAL POSTURE	Consolidated appeals from an order of the PCRA court granting post-conviction relief without conducting an evidentiary hearing.
STANDARD OF REVIEW	Post-conviction relief must be supported by factual findings resolving material factual controversies and credibility disputes, particularly in light of the presumption of counsel's effectiveness and the petitioner's burden to establish prejudice.
PRECEDENTIAL VALUE	Published precedential decision
PARTIES	Commonwealth of Pennsylvania, Al Peoples, a/k/a Kevin Matthews v. Al Peoples, a/k/a Kevin Matthews, Commonwealth of Pennsylvania

TOPICS

- post-conviction relief
- state post-conviction relief
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the PCRA court could award post-conviction relief without conducting an evidentiary hearing or making supported factual findings where the Commonwealth contested material facts.
2. Whether the PCRA court should first determine whether the petitioner's proffer was adequate to warrant an evidentiary hearing.
3. What procedures and findings the PCRA court must employ on remand in resolving claims of deficient attorney stewardship.

HOLDINGS

1. In light of the presumption of counsel's effectiveness and the petitioner's burden to establish prejudice, a PCRA court may not sustain an award of relief in areas of material factual controversy without supported factual findings.
2. On remand, the PCRA court must first consider the Commonwealth's argument that the petitioner's proffer was inadequate to implicate an evidentiary hearing in the first instance.
3. Because the circumstances may materially change if an evidentiary hearing is warranted, the PCRA court is not bound by its prior order under the law-of-the-case doctrine.

KEY QUOTATIONS

“in areas of material controversy supported factual findings are required to sustain an award of relief.” (961 A.2d at 109)

“particularly in close cases, a developed post-conviction record accompanied by specific factual findings and legal conclusions is an essential tool necessary to sharpen the issues” (961 A.2d at 109-10)

FACTUAL BACKGROUND

The PCRA court granted relief in a case involving claims of deficient attorney stewardship. The Commonwealth contested material facts relevant to those claims, but the PCRA court did not conduct an evidentiary hearing or make supported factual findings. The Supreme Court remanded for factual findings, credibility determinations, and legal conclusions addressing all properly presented claims.

PROCEDURAL HISTORY

The PCRA court granted relief despite the Commonwealth's contesting material facts and without conducting a hearing or making supported factual findings. The Supreme Court of Pennsylvania vacated the PCRA court's order and remanded for further proceedings, including consideration of whether the petitioner's proffer was sufficient to warrant a hearing.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The PCRA court must first determine whether the petitioner's proffer was adequate to warrant a hearing. If a hearing is warranted, its scope must be determined under the Pennsylvania Rules of Criminal Procedure, including Pa.R.Crim.P. 909. The court must resolve material factual controversies and credibility disputes through numbered factual findings, provide properly framed legal conclusions applying the criteria governing deficient attorney stewardship, address all properly presented claims, and proceed expeditiously. Jurisdiction was relinquished.

CASES CITED

- Commonwealth v. Gibson, 951 A.2d 1110, 1121-22 (Pa. 2008)

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