

SUPREME COURT OF IOWA

Heidi Ann Anfinson v. State of Iowa

No. 141 / 06-0076 (Iowa Oct. 17, 2008) · No. No. 141 / 06-0076 · Decided October 17, 2008

SUMMARY

The Supreme Court of Iowa held that trial counsel provided ineffective assistance by failing to investigate and present evidence of Heidi Anfinson's postpartum depression in support of her accidental-death defense. The court found a reasonable probability that this evidence could have affected the trial outcome and ordered a new trial. The court vacated the court of appeals decision, reversed the district court judgment, and remanded the case.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Hecht, Justice
JURISDICTION	Iowa
DECIDED	October 17, 2008
DOCKET	No. 141 / 06-0076
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Further review of the Iowa Court of Appeals decision affirming the denial of Anfinson's application for postconviction relief alleging ineffective assistance of trial counsel.
STANDARD OF REVIEW	Ineffective-assistance-of-counsel claims are reviewed de novo. The claimant must prove by a preponderance of the evidence that counsel failed to perform an essential duty and that the failure resulted in prejudice.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion
PARTIES	Heidi Ann Anfinson v. State of Iowa

TOPICS

post-conviction relief ineffective assistance right to counsel evidence mens rea

PRACTICE AREAS

criminal procedure post-conviction relief ineffective assistance of counsel criminal evidence

QUESTIONS PRESENTED

1. Whether trial counsel rendered ineffective assistance by failing to investigate and present evidence of Anfinson's postpartum depression in support of an accidental-death defense.
2. Whether trial counsel was ineffective for failing to investigate or present an insanity defense based on postpartum depression.
3. Whether trial counsel was ineffective for failing to present a diminished-responsibility defense based on postpartum depression.
4. Whether evidence of Anfinson's mental condition could be admitted for the limited purpose of supporting the accidental-death theory despite the absence of timely notice of insanity or diminished responsibility defenses.

HOLDINGS

1. Trial counsel provided ineffective assistance by failing to reasonably investigate Anfinson's postpartum depression and failing to present available evidence connecting that condition to the conduct relied upon by the State as evidence of criminal culpability. There was a reasonable probability of a different outcome had the evidence been developed and presented.
2. Anfinson failed to prove that counsel breached an essential duty by failing to investigate or present an insanity defense based on postpartum depression.
3. Anfinson failed to prove prejudice from counsel's failure to present a diminished-responsibility defense because diminished responsibility is limited to negating specific intent and is unavailable to a defendant convicted of second-degree murder, which requires malice aforethought rather than specific intent to kill.
4. Evidence of Anfinson's mental condition was not rendered inadmissible merely because she did not timely assert insanity or diminished responsibility, where the evidence was offered for the limited purpose of supporting the accidental-death theory rather than proving insanity or inability to form specific intent.

KEY QUOTATIONS

"We conclude, as did the district court, that trial counsel's strategic decision to renounce evidence of his client's compromised mental state after a less than complete investigation was not based on reasonable professional judgment." (15)

"A proper limiting instruction would suffice to clarify that Anfinson's purpose in offering such evidence is not in furtherance of a claim she was insane or incapable of forming a specific intent at the time of Jacob's death, but rather to support her theory Jacob's death was accidental." (16)

FACTUAL BACKGROUND

Anfinson's fifteen-day-old son disappeared while in her care after she left him unattended in bath water. She initially told police that she discovered the child drowned, and later said she panicked, transported the body to Saylorville Lake, and submerged it under rocks. Evidence available to trial counsel indicated that Anfinson had

severe postpartum depression, prior episodes of depression, self-mutilation, suicidal ideation, panic attacks, and related symptoms, but counsel did not adequately investigate or present that evidence in support of the accidental-death defense.

PROCEDURAL HISTORY

Anfinson was convicted of second-degree murder after a second trial following a mistrial in the first trial. The Iowa Court of Appeals affirmed the conviction on direct appeal. The district court denied her postconviction-relief application, the court of appeals affirmed, and the Supreme Court of Iowa granted further review.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The district court was directed to provide Anfinson a new trial. The court of appeals decision was vacated and the district court judgment was reversed.

CASES CITED

- State v. Anfinson, No. 00-0511 (Iowa Ct. App. July 3, 2002)
- State v. Barse, 748 N.W.2d 211, 214 (Iowa)
- State v. Straw, 709 N.W.2d 128, 133 (Iowa)
- Strickland v. Washington, 466 U.S. 668, 687-88, 690-91, 694 (1984)
- State v. Greene, 592 N.W.2d 24, 29 (Iowa)
- State v. Reynolds, 746 N.W.2d 837, 845 (Iowa)
- Ledezma v. State, 626 N.W.2d 134, 142-43 (Iowa)
- Tollett v. Henderson, 411 U.S. 258, 268 (1973)
- State v. Wilkens, 346 N.W.2d 16, 19 (Iowa)
- State v. Newman, 326 N.W.2d 788, 795 (Iowa)
- Pettes v. State, 418 N.W.2d 53, 56-57 (Iowa)
- State v. Gramenz, 256 Iowa 134, 138-42, 126 N.W.2d 285, 288-90 (1964)
- State v. Collins, 305 N.W.2d 434, 436-37 (Iowa)
- State v. McVey, 376 N.W.2d 585, 586-88 (Iowa)
- Veverka v. Cash, 318 N.W.2d 447, 449 (Iowa)
- Hendershott v. People, 653 P.2d 385, 393-94 (Colo. 1982)
- State v. Artzer, 609 N.W.2d 526, 531 (Iowa)