

SUPREME COURT OF IOWA

Heidi Ann Anfinson v. State of Iowa

758 N.W.2d 496 (Iowa 2008) · No. No. 06-0076 · Decided October 17, 2008

SUMMARY

The Supreme Court of Iowa held that trial counsel provided prejudicial ineffective assistance by failing to investigate and present evidence of Heidi Anfinson’s postpartum depression in support of her accidental-death defense. The court concluded that such evidence could have explained her conduct and created a reasonable probability of a different trial outcome, while rejecting ineffective-assistance claims based on insanity and diminished-responsibility defenses. The court vacated the court of appeals decision, reversed the district court judgment, and remanded for a new trial.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Hecht, Justice
JURISDICTION	Iowa
DECIDED	October 17, 2008
DOCKET	No. 06-0076
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Anfinson sought postconviction relief from her second-degree murder conviction, alleging ineffective assistance of trial counsel. The district court dismissed the application, the court of appeals affirmed, and the Supreme Court of Iowa granted further review.
STANDARD OF REVIEW	Ineffective-assistance-of-counsel claims are reviewed de novo. A 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; precedential
PARTIES	Heidi Ann Anfinson v. State of Iowa

TOPICS

- ineffective assistance
- post-conviction relief
- criminal procedure
- evidence
- remedies

PRACTICE AREAS

Criminal law

Postconviction relief

Ineffective assistance of counsel

Evidence

QUESTIONS PRESENTED

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

HOLDINGS

1. Trial counsel rendered ineffective assistance by failing to reasonably investigate and present evidence of Anfinson's severe postpartum depression in support of the accidental-death defense, and the failure prejudiced Anfinson because there was a reasonable probability of a different trial outcome.
2. Anfinson failed to establish 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 unavailable to negate malice aforethought in a second-degree-murder prosecution.
4. Evidence of a defendant's mental condition may be admitted for the limited purpose of supporting an accidental-death defense even when the defendant has not timely asserted insanity or diminished responsibility, provided the evidence is not offered to establish legal insanity or inability to form specific intent and an appropriate limiting instruction is given.

KEY QUOTATIONS

"The defense of "accidents happen" chosen and presented by trial counsel was highly unlikely to result in an acquittal if the three most troublesome aspects of Anfinson's conduct suggesting criminal culpability were left unexplained." (758 N.W.2d at 505)

"Deference for such choices is not unlimited, however, and it will not be stretched to deny Anfinson a new trial under the circumstances presented here." (758 N.W.2d at 505)

"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." (758 N.W.2d at 506)

FACTUAL BACKGROUND

Fifteen days after Anfinson gave birth, her infant son Jacob drowned while in her care. Anfinson initially told police that she left Jacob unattended in bath water and discovered him drowned when she returned; she later said she panicked, transported the body to Saylorville Lake, and submerged it under rocks. Evidence available to trial counsel indicated that Anfinson suffered severe postpartum depression, including hospitalization for depression, suicidal ideation, and panic attacks, but counsel did not investigate or present that evidence in support of the accidental-death defense.

PROCEDURAL HISTORY

Anfinson was charged with first-degree murder and child endangerment after her infant son's death. Her first trial ended in a mistrial, and a second trial resulted in a second-degree murder conviction; the court of appeals affirmed on direct appeal. In postconviction proceedings, the district court found counsel breached an essential duty but found no resulting prejudice, and the court of appeals affirmed dismissal. The Supreme Court of Iowa vacated the court of appeals decision, reversed the district court judgment, and remanded for a new trial.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the district court for a new trial.

CASES CITED

- State v. Bearse, 748 N.W.2d 211 (Iowa 2008)
- State v. Straw, 709 N.W.2d 128 (Iowa 2006)
- Strickland v. Washington, 466 U.S. 668 (1984)
- State v. Greene, 592 N.W.2d 24 (Iowa 1999)
- State v. Reynolds, 746 N.W.2d 837 (Iowa 2008)
- Ledezma v. State, 626 N.W.2d 134 (Iowa 2001)
- Tollett v. Henderson, 411 U.S. 258 (1973)
- State v. Wilkens, 346 N.W.2d 16 (Iowa 1984)
- State v. Newman, 326 N.W.2d 788 (Iowa 1982)
- Pettes v. State, 418 N.W.2d 53 (Iowa 1988)
- State v. Gramenz, 256 Iowa 134, 126 N.W.2d 285 (1964)
- State v. Collins, 305 N.W.2d 434 (Iowa 1981)
- State v. McVey, 376 N.W.2d 585 (Iowa 1985)
- Veverka v. Cash, 318 N.W.2d 447 (Iowa 1982)
- Hendershott v. People, 653 P.2d 385 (Colo. 1982)
- State v. Artzer, 609 N.W.2d 526 (Iowa 2000)
- State v. Decker, 744 N.W.2d 346 (Iowa 2008)

- State v. Duncan, 710 N.W.2d 34 (Iowa 2006)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/iowa-supreme-court-of-iowa/2008/heidi-ann-anfinson-v-state-of-iowa-gl5p9vj4>