

SUPERIOR COURT OF PENNSYLVANIA

Commonwealth v. Adames

2026 Pa. Super. 9 · No. 310 MDA 2025 · Decided January 14, 2026

SUMMARY

The Pennsylvania Superior Court affirmed the denial of the Commonwealth’s motion to involuntarily medicate Angel Luis Adames to restore his competency to stand trial. The court held that the Commonwealth failed to present sufficient evidence under *Sell v. United States* that medication was substantially likely to render Adames competent. The court also held that the Commonwealth had not demonstrated compliance with the Pennsylvania Mental Health Procedures Act’s procedures for involuntary treatment based on dangerousness.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Dubow, J.; Kunselman, J.; Beck, J.
JURISDICTION	Pennsylvania Superior Court
DECIDED	January 14, 2026
DOCKET	310 MDA 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Commonwealth appealed from an order denying its motion to involuntarily administer psychotropic medication to an incompetent criminal defendant for the purpose of restoring competency to stand trial and denying reconsideration.
STANDARD OF REVIEW	De novo review of the Commonwealth's sufficiency challenge, viewing the evidence in the light most favorable to Appellee.
PRECEDENTIAL VALUE	Published Pennsylvania Superior Court opinion
PARTIES	Commonwealth of Pennsylvania v. Angel Luis Adames

TOPICS

- criminal procedure
- due process
- appellate procedure
- fourth amendment

PRACTICE AREAS

- criminal procedure
- constitutional law
- mental health law
- appellate procedure

QUESTIONS PRESENTED

1. Whether the Commonwealth presented sufficient evidence under *Sell v. United States* to authorize involuntary administration of antipsychotic medication to render Adames competent to stand trial.
2. Whether Adames's alleged dangerousness supplied an alternative basis for involuntary medication under Harper and Pennsylvania's Mental Health Procedures Act.
3. Whether the Commonwealth preserved its dangerousness-based argument for appellate review.

HOLDINGS

1. The Commonwealth failed to present sufficient evidence that involuntary medication was substantially likely to render Adames competent to stand trial; therefore, the trial court properly denied the motion to medicate him over his objection.
2. The Commonwealth was not entitled to involuntary medication based on Adames's alleged dangerousness because it failed to present evidence that the hospital director or county administrator complied with the procedural requirements of Pennsylvania's Mental Health Procedures Act.
3. The Commonwealth preserved its dangerousness-based argument for appellate review.

KEY QUOTATIONS

“The Commonwealth failed to ask the question directly, and Dr. Nell merely opined that Appellee’s prognosis is better with psychotropic treatment and that the medication would not interfere with his ability to aid in his defense.” (9)

“The MHPA, however, properly imposes administrative requirements before a court may order that a hospital involuntarily administer medication and it is the responsibility of the Commonwealth to provide the trial court with evidence that the hospital has complied.” (14)

FACTUAL BACKGROUND

Angel Luis Adames, who suffered from a delusional disorder with paranoid ideation, believed that Gregory Crammer was a terrorist and shot and killed him after waiting in Crammer's apartment-building bathroom. After being charged with murder, aggravated assault, and burglary, Adames was found incompetent to stand trial and committed to Norristown State Hospital. His treating psychiatrist testified that he was dangerous and that antipsychotic medication might improve his condition, but she did not testify that medication was substantially likely to restore his competence to stand trial. The Commonwealth also failed to establish that the hospital or county administrator had followed the Mental Health Procedures Act procedures for involuntary treatment based on dangerousness.

PROCEDURAL HISTORY

Adames was charged with murder, aggravated assault, and burglary and was found incompetent to stand trial. He was committed to Norristown State Hospital for involuntary treatment. The Commonwealth sought court authorization to medicate him over his objection, relying on *Sell* and evidence that he posed a danger to others. The Berks County Court of Common Pleas denied the motion and reconsideration, and the Commonwealth took an interlocutory appeal under the collateral-order doctrine.

DISPOSITION

affirmed

CASES CITED

- Commonwealth v. Sam, 952 A.2d 565 (Pa. 2008)
- Commonwealth v. Chambers, 188 A.3d 400 (Pa. 2018)
- Sell v. United States, 539 U.S. 166 (2003)
- In re Hancock, 719 A.2d 1053 (Pa. Super. 1998)
- Washington v. Harper, 494 U.S. 210 (1990)
- Riggins v. Nevada, 504 U.S. 127 (1992)
- Commonwealth v. Hunter, 60 A.3d 156 (Pa. Super. 2013)

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