

SUPREME COURT OF IOWA

State of Iowa v. Deyawna Leanett Taylor

881 N.W.2d 72 (Iowa 2016) · No. No. 14-2075 · Decided June 17, 2016

SUMMARY

The Supreme Court of Iowa held that the State failed to establish either good cause for delaying trial beyond Iowa's ninety-day speedy-trial deadline or a knowing and intelligent waiver by the defendant. The court rejected reliance on Taylor's incarceration in another county, her proffer agreement, and the timing of her pretrial motion to dismiss. It vacated the court of appeals decision, reversed the district court judgment, and remanded for dismissal of all charges.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Appel, Justice
JURISDICTION	Iowa
DECIDED	June 17, 2016
DOCKET	No. 14-2075
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Taylor sought further review after the Iowa Court of Appeals affirmed her convictions. The Supreme Court of Iowa vacated the court of appeals decision, reversed the district court judgment, and remanded for dismissal of all charges.
STANDARD OF REVIEW	The court reviewed the district court's ruling on the speedy-trial motion for abuse of discretion, while recognizing that the district court's discretion narrows when speedy-trial grounds are at issue.
PRECEDENTIAL VALUE	Published Iowa Supreme Court opinion; precedential.
PARTIES	Deyawna Leanett Taylor v. State of Iowa

TOPICS

- speedy trial
- criminal procedure
- appellate procedure
- standard of review

PRACTICE AREAS

- criminal procedure
- constitutional law
- appellate procedure

QUESTIONS PRESENTED

1. Whether the State established good cause for failing to bring Taylor to trial within ninety days under Iowa Rule of Criminal Procedure 2.33(2)(b).
2. Whether Taylor knowingly and intelligently waived her speedy-trial right by entering into the proffer agreement after the speedy-trial deadline had expired.
3. Whether Taylor waived her speedy-trial right by asserting it only two days before the scheduled trial.

HOLDINGS

1. The State failed to establish good cause for the delay because it presented no evidence showing due diligence in locating Taylor or bringing her to court while she was in state custody.
2. The State failed to prove that Taylor knowingly and intelligently waived her speedy-trial right through the proffer agreement; mere acquiescence to a delayed trial is insufficient.
3. Taylor did not waive speedy trial solely by filing her pretrial motion to dismiss two days before the scheduled trial.

KEY QUOTATIONS

“Under our cases, good cause to avoid speedy trial must be rooted in facts, not conclusions.” (at 78)

“Clearly, the State failed to show the defendant knowingly and intelligently waived speedy trial rights as part of the alleged proffer agreement in this case.” (at 80)

FACTUAL BACKGROUND

The State filed charges against Taylor on July 28, 2014. Taylor did not appear for her scheduled arraignment because she was incarcerated in Polk County on unrelated charges, and she was not arraigned in Story County until November 12, after the ninety-day speedy-trial deadline had expired. On that date, she entered into a proffer agreement under which the charges would be reduced if she cooperated in another prosecution, and trial was set for December 16. Taylor moved to dismiss on December 8, but the district court found that she had waived speedy trial.

PROCEDURAL HISTORY

The State charged Taylor with driving while barred and prostitution. After the ninety-day speedy-trial period expired, Taylor entered into a proffer agreement concerning cooperation in another prosecution and later moved to dismiss on speedy-trial grounds. The district court denied the motion, Taylor was convicted following a trial on the minutes, and the Iowa Court of Appeals affirmed. The Supreme Court of Iowa granted further review and ordered dismissal.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The district court was directed to dismiss all charges. The dismissal was an absolute dismissal, or discharge with prejudice.

CASES CITED

- State v. Winters, 690 N.W.2d 903, 907-10 (Iowa 2005)
- Ennenga v. State, 812 N.W.2d 696, 701, 705-06 (Iowa 2012)
- State v. Nelson, 600 N.W.2d 598, 600 (Iowa 1999)
- State v. Miller, 637 N.W.2d 201, 204-06 (Iowa 2001)
- State v. Sassman, 226 N.W.2d 808, 809 (Iowa 1975)
- State v. Campbell, 714 N.W.2d 622, 628-29 (Iowa 2006)
- United States v. Jenkins, 701 F.2d 850, 853-54, 856-58 (10th Cir. 1983)
- United States v. Salzmänn, 548 F.2d 395, 403-04 (2d Cir. 1976) (Feinberg, J., concurring)
- State v. Lybarger, 263 N.W.2d 545, 547-48 (Iowa 1978)
- State v. Zaehring, 306 N.W.2d 792, 794-96 (Iowa 1981)
- State v. Gorham, 206 N.W.2d 908, 911-12 (Iowa 1973)
- Johnson v. Zerbst, 304 U.S. 458, 464 (1938)
- State v. Utter, 803 N.W.2d 647, 653-55 (Iowa 2011)
- United States v. Roberts, 515 F.2d 642, 647 (2d Cir. 1975)
- State v. La Mar, 224 N.W.2d 252, 253-54 (Iowa 1974)
- State v. Paulsen, 265 N.W.2d 581, 585 (Iowa 1978)
- Barker v. Wingo, 407 U.S. 514, 530-32 (1972)
- State v. Olsen, 528 N.W.2d 651, 654 (Iowa Ct. App. 1995)
- State v. Petersen, 288 N.W.2d 332, 335 (Iowa 1980)
- State v. O'Bryan, 522 N.W.2d 103, 106 (Iowa Ct. App. 1994)
- State v. Bond, 340 N.W.2d 276, 279-80 (Iowa 1983)
- State v. Abrahamson, 746 N.W.2d 270, 273 (Iowa 2008)