

COURT OF APPEALS OF ARKANSAS, DIVISION III

Dedric Patterson v. State of Arkansas

Patterson, 2026 Ark. App. 325 (Ark. Ct. App. 2026) · No. CR-25-613 · Decided May 20, 2026

SUMMARY

The Arkansas Court of Appeals orders rebriefing in a no-merit appeal from the revocation of Dedric Patterson's probation. The court holds that appellate counsel's brief inadequately addressed the circuit court's denial of Patterson's request for community correction or alternative sentencing, an adverse ruling that had to be discussed under Anders and Arkansas Supreme Court Rule 4-3(b). The court denies counsel's motion to withdraw without prejudice and directs counsel to file a substituted brief.

CASE DETAILS

COURT	Court of Appeals of Arkansas, Division III
WRITING FOR THE COURT	Casey R. Tucker; Chief Judge Klappenbach; Judge Wood
JURISDICTION	Arkansas Court of Appeals
DECIDED	May 20, 2026
DOCKET	CR-25-613
DISPOSITION	other
PROCEDURAL POSTURE	No-merit appeal from the Crawford County Circuit Court's revocation of Patterson's probation and imposition of a six-year sentence; appellate counsel sought to withdraw.
STANDARD OF REVIEW	In a no-merit appeal, the appellate court must conduct a full examination of the proceedings to determine whether the case is wholly frivolous and must ensure that counsel's brief addresses all adverse rulings.
PRECEDENTIAL VALUE	Published
PARTIES	Dedric Patterson v. State of Arkansas

TOPICS

- appellate procedure
- criminal procedure
- probation
- sentencing

PRACTICE AREAS

- criminal appellate procedure
- probation revocation
- sentencing

QUESTIONS PRESENTED

- 1. Whether counsel's no-merit brief adequately addressed all adverse rulings made by the circuit court.
- 2. Whether counsel was required to address the circuit court's denial of Patterson's request for community-corrections or alternative sentencing in the no-merit brief.

HOLDINGS

- 1. A no-merit brief must identify every adverse ruling made by the circuit court on objections, motions, and requests and explain why each ruling does not provide a meritorious ground for reversal.
- 2. The circuit court's denial of a defendant's request for community-corrections or alternative sentencing is an adverse ruling that counsel must address in a no-merit brief; failure to do so requires rebriefing and prevents counsel's withdrawal.

KEY QUOTATIONS

- “The circuit court’s denial of Patterson’s request for an alternative sentence constitutes an adverse ruling.” (at 3)
- “We order rebriefing to address this issue.” (at 3)

FACTUAL BACKGROUND

Patterson pleaded guilty in October 2024 to third-degree domestic battery, second offense, and received probation subject to conditions including reporting, providing proof of employment or education and residence, paying fees and fines, and participating in a domestic-violence intervention program. The State alleged that he failed to report, provide required information, pay supervision fees, fines, costs, and fees, and enroll in the intervention program. At the revocation hearing, the circuit court found that Patterson had essentially failed to comply with any court-ordered condition, revoked probation, and imposed a six-year prison sentence while satisfying his fines and court costs.

PROCEDURAL HISTORY

Patterson pleaded guilty to third-degree domestic battery, second offense, and received a sentence including probation. After the State alleged multiple probation violations, the circuit court revoked probation and sentenced Patterson to six years in the Arkansas Division of Correction. Counsel filed a no-merit brief under Anders and Arkansas Supreme Court Rule 4-3(b), but the Court of Appeals denied the motion to withdraw and ordered rebriefing because counsel failed to address the denial of Patterson's request for community-corrections or alternative sentencing.

DISPOSITION

other

REMAND INSTRUCTIONS

Appellate counsel must file a substituted no-merit brief within fifteen days addressing the denial of Patterson's request for community-corrections or alternative sentencing. If a substituted brief is filed, the clerk must forward it and the motion to withdraw to Patterson, who will have thirty days to submit pro se points; the State may file a responsive brief if pro se points are submitted.

CASES CITED

- *Anders v. California*, 386 U.S. 738 (1967)
- *Skaggs v. State*, 2023 Ark. App. 325, 670 S.W.3d 811
- *Gatewood v. State*, 2024 Ark. App. 445
- *Podolak v. State*, 2026 Ark. App. 18

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