

SUPREME COURT OF IOWA

State of Iowa v. Justice Mathis

No. 20-0464 (Iowa Mar. 18, 2022) · No. No. 20-0464 · Decided March 18, 2022

SUMMARY

The Iowa Supreme Court reviewed Justice Mathis’s convictions for three counts of second-degree sexual abuse. The court held that sufficient evidence supported the convictions but that the jury instruction stating that the alleged victims’ testimony did not require corroboration improperly emphasized their testimony. Because the error was presumptively prejudicial and was not affirmatively shown to be harmless, the court vacated the court of appeals decision and district court judgment and remanded the case.

CASE DETAILS

COURT	Supreme Court of Iowa
WRITING FOR THE COURT	Justice McDonald; all other justices of the Supreme Court of Iowa
JURISDICTION	Iowa
DECIDED	March 18, 2022
DOCKET	No. 20-0464
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Direct appeal from convictions for three counts of sexual abuse in the second degree. The Iowa Court of Appeals affirmed, and the Supreme Court of Iowa granted Mathis's application for further review.
STANDARD OF REVIEW	Sufficiency-of-the-evidence claims are reviewed for correction of errors at law, with substantial deference to the jury's verdict. Challenges to jury instructions are also reviewed for correction of errors at law, and the instructions are evaluated as a whole and in context.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Justice Mathis v. State of Iowa

TOPICS

- jury instructions
- criminal procedure
- evidence
- harmless error
- appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

evidence

jury instructions

appellate practice

QUESTIONS PRESENTED

1. Whether substantial evidence supported Mathis's convictions for three counts of second-degree sexual abuse.
2. Whether the district court improperly instructed the jury that the testimony of an alleged victim of sexual offenses need not be corroborated.
3. Whether the erroneous noncorroboration instruction was prejudicial and required reversal of the convictions.

HOLDINGS

1. Substantial evidence supported Mathis's convictions because B.T. and L.S. testified to specific sex acts performed by Mathis while they were under twelve years old, satisfying the elements in the marshaling instructions.
2. The instruction that there is no requirement that an alleged sexual-offense victim's testimony be corroborated did not violate Iowa Code section 709.6.
3. The instruction was improper because it singled out the alleged victims' testimony as not requiring corroboration without a symmetrical instruction concerning the defendant's testimony or a universal instruction concerning all witnesses.
4. The instructional error was prejudicial and required reversal because the record did not affirmatively establish the absence of prejudice, the children's testimony lacked corroboration, and the prosecutor made the noncorroboration instruction a focal point of closing argument.

KEY QUOTATIONS

“instructions that set apart, highlight, or accentuate the testimony of a particular witness or a particular piece of evidence are improper.” (9-10)

“In the absence of any other instruction regarding the uncorroborated testimony of other witnesses, the instruction unduly emphasized the complainant witness’s testimony.” (13)

“While there is sufficient evidence to sustain the convictions, there is not strong evidence of the defendant’s guilt, and the improper instruction was a focal point of the State’s case.” (14)

FACTUAL BACKGROUND

Mathis lived in a home with his grandmother and stepgrandfather, where his young relatives B.T. and L.S. frequently visited between approximately October 2015 and November 2017. B.T. testified that Mathis engaged in vaginal intercourse with her, and L.S. testified that Mathis engaged in anal intercourse with him on more than one occasion. Both children eventually reported sexual abuse, but physical examinations revealed no physical evidence corroborating their accounts; Mathis denied the allegations.

PROCEDURAL HISTORY

Mathis was convicted in the Iowa District Court for Decatur County of three counts of second-degree sexual abuse. The court of appeals affirmed the convictions. The Supreme Court of Iowa vacated the court of appeals decision and the district court judgment, holding that the jury instruction emphasizing that the alleged victims' testimony did not require corroboration was improper and prejudicial.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The convictions and district court judgment were vacated, and the case was remanded to the district court for further proceedings.

CASES CITED

- State v. Jones, 967 N.W.2d 336, 339 (Iowa 2021)
- State v. Tipton, 897 N.W.2d 653, 692 (Iowa 2017)
- State v. Williams, 695 N.W.2d 23, 27-28 (Iowa 2005)
- State v. Canal, 773 N.W.2d 528, 530 (Iowa 2009)
- State v. Donahue, 957 N.W.2d 1, 10-11 (Iowa 2021)
- State v. Hildreth, 582 N.W.2d 167, 170 (Iowa 1998)
- State v. Lacey, 968 N.W.2d 792, 803 (Iowa 2021)
- State v. Nichter, 720 N.W.2d 547, 556 (Iowa 2006)
- State v. Smith, 508 N.W.2d 101, 103 (Iowa Ct. App. 1993)
- State v. Musser, 721 N.W.2d 758, 761 (Iowa 2006)
- State v. Rohm, 609 N.W.2d 504, 509 (Iowa 2000) (en banc)
- State v. Kraai, 969 N.W.2d 487, 491-99 (Iowa 2022)
- State v. Liggins, 557 N.W.2d 263, 267 (Iowa 1996)
- Thavenet v. Davis, 589 N.W.2d 233, 237 (Iowa 1999) (en banc)
- State v. Davis, 951 N.W.2d 8, 17 (Iowa 2020)
- State v. Plain, 898 N.W.2d 801, 817 (Iowa 2017)
- State v. Hoyman, 863 N.W.2d 1, 7 (Iowa 2015)
- State v. Hanes, 790 N.W.2d 545, 551 (Iowa 2010)
- State v. Marin, 788 N.W.2d 833, 836 (Iowa 2010)
- State v. Gansz, 376 N.W.2d 887, 891 (Iowa 1985)
- Alcala v. Marriott Int'l, Inc., 880 N.W.2d 699 (Iowa 2016)
- State v. Dudley, 856 N.W.2d 668, 678-79 (Iowa 2014)
- Garza v. State, 231 P.3d 884, 891 (Wyo. 2010)

