

COURT OF APPEALS OF TEXAS, NINTH DISTRICT AT BEAUMONT

Paul Eugene Fields v. the State of Texas

Fields v. State · No. No. 09-21-00046-CR · Decided June 22, 2022

SUMMARY

The Ninth Court of Appeals of Texas at Beaumont held that Paul Eugene Fields was denied his constitutional right to a speedy trial under the Barker v. Wingo balancing test. The court reversed the conviction and rendered judgment dismissing the prosecution with prejudice.

CASE DETAILS

COURT	Court of Appeals of Texas, Ninth District at Beaumont
WRITING FOR THE COURT	Charles Kreger; Golemon, C.J.; Johnson, J.
JURISDICTION	Texas
DECIDED	June 22, 2022
DOCKET	No. 09-21-00046-CR
DISPOSITION	other
PROCEDURAL POSTURE	Appellant appealed a DWI conviction entered pursuant to a plea bargain, challenging the denial of his motion to dismiss for violation of his constitutional right to a speedy trial.
STANDARD OF REVIEW	Speedy-trial claims are reviewed under a bifurcated standard: abuse of discretion for factual components and de novo review for legal components. The appellate court applies de novo review when balancing the Barker factors.
PRECEDENTIAL VALUE	Unpublished memorandum opinion; the opinion states 'Do Not Publish.'
PARTIES	Paul Eugene Fields v. The State of Texas

TOPICS

- speedy trial
- criminal procedure
- plea bargaining
- appellate procedure
- fourteenth amendment

PRACTICE AREAS

- criminal procedure
- constitutional law
- appellate procedure

QUESTIONS PRESENTED

1. Whether the approximately four-and-one-half-year delay between Fields's arrest and disposition of the DWI charge violated his Sixth Amendment right to a speedy trial under the Barker v. Wingo balancing test.
2. Whether Fields's failure to proceed under the Interstate Agreement on Detainers Act and his periods of federal custody eliminated or reduced the State's responsibility for the delay.
3. Whether Fields established prejudice sufficient to support dismissal of the prosecution with prejudice.

HOLDINGS

1. A delay of approximately four and one-half years between arrest and trial or disposition is presumptively prejudicial and requires examination of the remaining Barker factors.
2. The four Barker factors collectively established that Fields was denied his constitutional right to a speedy trial.
3. A defendant may establish prejudice from delay in a state prosecution even while incarcerated on an unrelated federal sentence.
4. The appropriate remedy for the established constitutional speedy-trial violation was reversal of the judgment of conviction and dismissal of the prosecution with prejudice.

KEY QUOTATIONS

“Instead, in evaluating speedy trial claims, courts are required to engage in a balancing process to determine whether the delays in bringing a defendant’s case to trial deprived the defendant of a speedy trial.” (at 4)

“Appellant was denied his right to a speedy trial, as guaranteed to him under the Constitution.” (at 10)

FACTUAL BACKGROUND

Fields was arrested for driving while intoxicated on April 23, 2016. He remained free on bond for much of the case but was held in federal custody from approximately August 2017 until May 2020. He twice requested a speedy trial, in February 2018 and January 2019, but was not brought to trial before pleading guilty in December 2020. Fields testified that the unresolved Texas charge prevented his participation in a residential drug-and-alcohol treatment program and possible early release, and that the delay impaired his memory.

PROCEDURAL HISTORY

Fields was arrested for driving while intoxicated in April 2016 and remained on bond for periods interrupted by federal custody. He twice asserted his speedy-trial right before the trial court, which denied his motion to dismiss and entered written findings and conclusions. After the denial, Fields pleaded guilty pursuant to a plea bargain, and the trial court certified his right to appeal the speedy-trial issue. The court of appeals reversed the conviction and rendered judgment dismissing the prosecution with prejudice.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. The judgment of conviction was reversed and judgment was rendered dismissing the prosecution with prejudice.

CASES CITED

- Barker v. Wingo, 407 U.S. 514, 527, 530, 533 (1972)
- Johnson v. State, 954 S.W.2d 770, 771 (Tex. Crim. App. 1997)
- Zamorano v. State, 84 S.W.3d 643, 648 (Tex. Crim. App. 2002)
- Doggett v. United States, 505 U.S. 647, 652 n.1 (1992)
- Balderas v. State, 517 S.W.3d 756, 767-68 (Tex. Crim. App. 2016)
- Bosworth v. State, 422 S.W.3d 759, 769 (Tex. App.—Texarkana 2013, pet. ref'd.)
- Starks v. State, 266 S.W.3d 605, 610 (Tex. App.—El Paso 2008, no pet.)
- Turner v. State, 545 S.W.2d 133, 138 (Tex. Crim. App. 1976)
- Smith v. Hooey, 393 U.S. 374, 378 (1969)