

ORIGINAL

IN THE COURT OF APPEALS OF THE STATE OF MISSISSIPPI

CAUSE No. 2017-CP-00165-CoA

RONALD J. HOOD
APPELLANT

VS.

STATE OF MISSISSIPPI
APPELLE

FILED

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SUPREME COURT
COURT OF APPEALS

APPEAL

FROM THE CIRCUIT COURT OF YAZOO COUNTY, MISSISSIPPI

REPLY BRIEF OF APPELLANT

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SUMMARY OF THE ARGUMENT

Trial counsel for Ronald Hood filed a motion for mental examination to determine Hood's competency to stand trial. The motion specifically stated Hood could not presently consent with his attorney with a reasonable degree of rational understanding and there was doubt whether he would be able to do so at trial. The trial judge granted the motion for the reasons stated in the motion. Hood underwent an examination by Dr. Christopher Lott, who mailed his report to the trial judge. The trial judge did not hold a competency hearing nor adjudicate whether Hood was competent to stand trial on the record, as mandated by Rule 4.06 of the Uniform Rules of Circuit and County Court Practice. At the time of Hood's 2007 trial, Rule 4.06 had been in effect for more than twelve (12) years.

In *Sanders v. State*, 9 So.3d 1132 (Miss. 2009), the Mississippi Supreme Court affirmed the mandatory language used in Rule 4.06. Nevertheless, the State asserts *Sanders* announced a new rule; therefore, invoking the holding in *Manning v. State*, 929 So.2d 855, 899 (Miss. 2006) that generally new rules of procedure do not apply retroactively. *Sanders* did not break new ground, as the State implies, but rather it affirmed

and provided clarity to the direct and strict language used in Rule 9.06. Even if Sanders did announce a new rule, it would still apply to the case at bar because Houd's direct appeal was pending at the time Sanders was issued. See *Manning*, *supra* at 848.

The State asserts that if Sanders does apply, then the trial court fulfilled the purpose and spirit of Sanders when it denied Houd's FR motion. The State suggests, without any authority that is on point, this somehow constituted a retroactive competency hearing and, therefore, fulfilled the purposes of Rule 9.06. No case law supports such reasoning. The State further failed to meet its burden showing that a meaningful retroactive competency hearing is possible, instead choosing to rest its argument by framing the circuit court's denial of Houd's FR motion as a retroactive competency hearing. See *Pickens v. State*, 240 Ga.3d 1001, 1017 (2017).

Accordingly, this court should determine that Houd's due process rights have been violated, **overturn** his conviction, vacate his sentence, and remand Houd back to circuit court for a competency hearing and new trial, if Houd is found to be competent.

ARGUMENT

I. Whether the circuit court erred when it denied Hood's PCR Motion on Hood's due process rights being violated by the trial court's failure to conduct a competency hearing pursuant to Uniform Circuit & County Court Rule 9.06.

A. Sanders is retroactive and does apply to Hood's 2007 conviction.

Prior to trial, the trial judge granted Ronald Hood's (hereinafter "Hood") trial counsel, Trent Walker (hereinafter "Mr. Walker"), motion for mental examination, pursuant to Rule 9.06 of the Uniform Circuit & County Court Practice (hereinafter "Rule 9.06"). Rule 9.06 was in effect at the time of Hood's trial and outlined the procedure that was to take place in the event a criminal defendant's competency to stand trial was in question.

The relevant portion of Rule 9.06 states the following:

"After the [mental] examination the court **shall** conduct a hearing to determine if the defendant is competent to stand trial. After hearing all of the evidence, the court **shall** weigh the evidence and make a determination of whether the defendant is competent to stand trial. If the court finds that the defendant is competent to stand trial, then the court **shall** make the finding a matter of record and the case will then proceed to trial."

U.C.L.C.R.P. Rule 9.06 (emphasis added).

Approximately two (2) months prior to trial, Hood was evaluated by Dr. Christopher Lott (hereinafter Dr. Lott). Dr. Lott mailed his evaluation report to the trial judge. At no point before Hood's trial, nor on the day of the trial, did the trial judge acknowledge receipt of Dr. Lott's report. At no point during any of the proceedings did the trial judge indicate she had reviewed Dr. Lott's report. At no point did the trial judge conduct a competency hearing or otherwise inquire as to Hood's mental competency to stand trial. Likewise, the trial judge failed to make any on-the-record finding as to Hood's competency. Indeed, the State concedes that the trial court failed to conduct a competency hearing or adjudicate Hood's competency to stand trial on the record. (Appellee's Brief at pp. 11-12).

1. Sanders did not create a new rule and the United States Supreme Court holding in Teague does not apply.

In his PCR Motion, Hood argued that his due process rights were violated by the trial court's failure to conduct a competency hearing after having ordered a mental evaluation to determine his mental fitness to stand trial. Hood cited Rule 9.06 and, to support his argument also cited *Sanders v. State*, 950,3d 1132 (Miss. 2009). Our Supreme Court affirmed the mandatory language used in Rule 9.06, *Id.* at 1136. The State now argues that *Sanders* does not apply to Hood's 2007 conviction because it "represents a change in Procedure which is not retroactive," (Appellee's Brief at p. 4). However, that manner of framing the issue misconstrues the state of the law at the time of Hood's trial, conviction, and sentencing.

It is undisputed that Rule 9.06 became effective on May 1, 1995, more than twelve (12) years before Hood's trial. During that time there were no changes made to the rule. Prior to

Sanders, there were multiple other cases that affirmed the mandatory language used in Rule 9.06.¹ The Mississippi Supreme Court, when addressing a trial court's compliance with Rule 9.06, stated "The rule requires that a hearing be conducted after an examination is performed and that the trial court, considering all the evidence, makes a determination as to competency and places the findings in the record." *Scott v. State*, 878 So.2d 933, 952 (Miss. 2004). *Scott* was handed down more than three (3) years prior to Hood's trial, and nearly five (5) years prior to Sanders.

The United States Supreme Court stated, "[N]ew constitutional rules of criminal procedure will not be applicable to those cases which have become final before the new rules are announced." *Teague v. Lane*, 489 U.S. 288, 310, 109 S.Ct. 1060, 1075 (1989). The *Teague* Court generally observed that "a case announces a new rule when it breaks new ground or imposes a new obligation on the States or Federal Government," *Id.* at 301, 1070. Our Supreme Court adopted the principles outlined in *Teague* in *Manning v. State*, 924 So.2d 885, 900 (Miss. 2006).

1. These cases include *Ficklin v. State*, 758 So.2d 457 (Miss. Ct. App. 2000); *Magee v. State*, 914 So.2d 729 (Miss. Ct. App. 2005); *Scott v. State*, 878 So.2d 933 (Miss. 2004); and *Stater v. State*, 989 So.2d 938 (Miss. Ct. App. 2008). Hood has succinctly addressed these cases and their application in his Appellant's Amended Brief at pp. 25-26).

Certainly it cannot be said that Sanders broke new ground or imposed a new obligation on trial judges. Here, the trial judge should have known that Rule 4.06 compelled a competency hearing once she ordered Hood to undergo a mental examination to determine his competency to stand trial.

The State suggests that *Jones v. State*, 902 So.2d 593 (Miss. Ct. App. 2004) was controlling at the time of Hood's trial. However, a close examination reveals that, unlike the case at bar, the trial judge in *Jones* actually entered an order noting the findings of the defendant's mental examination and made that finding a matter of record. *Id.* at 597. Moreover, *Jones* relied upon *Conner v. State*, 632 So.2d 1239 (Miss. 1993), which analyzed former Rule 4.08. Rule 4.08 did not contain the carefully crafted mandatory language that was used in Rule 4.06. Rule 4.08 was not in effect at the time of Hood's trial.

The State also points to *Brown v. State*, 198 So.3d 325 (Miss. Ct. App. 2015) in its attempt to suggest why Sanders should not apply to the case sub judice. In so doing, the State overlooks some important facts that distinguish *Brown* from Hood.

Brown involved a defendant who entered a

guilty plea. Prior to the plea, Brown's attorney filed a motion for "psychiatric assistance." Id. at 329. Referring to the motion filed by Brown's attorney, the Mississippi Supreme Court stated, "Significantly, Brown's motion did not claim he was presently incompetent[,] and that the court's order granting the motion "did not state that reasonable grounds existed to believe [the defendant] was presently incompetent." Id. (italics omitted).

Unlike Brown, it is undisputed that the motion Mr. Walker filed on behalf of Hood stated that "[Hood] does not have the present ability to consult with his lawyer with a reasonable degree of rational understanding to adequately assist with his defense" and that there was doubt "whether [he] will be able to assist in his defense at trial [...]." (Consolidated R. vol. 1 at 20-21)². It is undisputed that the trial judge found the motion "well-taken." (Id. at 22). Indeed, the State concedes the trial judge "granted the motion for the reasons stated in the motion by defense counsel." (Appellee's Brief at p. 12). Obviously the trial

² Citations to the voluminous record follow the scheme used in Appellant's Amended Brief. See Appellant's Amended Brief n. 1 and n. 3.

judge carefully reviewed the defense's motion for a mental examination and concluded there were reasonable grounds to believe Hood was not mentally fit for trial. Obviously if the trial judge had any doubt as to the validity of the claims made in Mr. Walker's motion, the trial court could have easily held an evidentiary hearing prior to granting the motion for mental examination. (See, e.g., *Bradley v. State*, 116 So.3d 1093 (Miss. Ct. App. 2013); *Evans v. State*, 984 So.2d 308 (Miss. Ct. App. 2007); *Richardson v. State*, 767 So.2d 195 (Miss. 2000); and *States v. State*, 989 So.2d 938 (Miss. Ct. App. 2008)).

Ultimately, the Brown court concluded that the trial judge received nothing that should have alerted it that Brown was suffering from mental issues. Brown, *supra*, at 330. In the case at bar, beyond Mr. Walker's motion for mental examination, the trial judge actually had to revoke Hood's bond after he was deemed a danger to himself. Further, the colloquy between the trial judge, an assistant district attorney, and a deputy, strongly suggests the trial judge was familiar with the fact Hood had remained on suicide watch at the county jail.³ These facts are undisputed by the State.

³ See Consolidated R. vol. 3 at pp. 182-83, lines 24-29 and 3-40 and p. 188, lines 25-28.

The Brown Court further concluded, "Importantly, Brown denied any history of mental disease or psychiatric illness." Brown, *Supra*, at 333. It is undisputed that Hood informed Dr. Lott of his past mental health issues. At sentencing, Hood stated to the trial judge that he had "mental problems" and had been "diagnosed with manic depressive personality disorder." (Consolidated R. Vol. 3 at p. 185, lines 4-8). Even if one takes Dr. Lott's general opinion at face value and assumes the errors, contradictions, and omissions in the report are insignificant, it is clear that, at a minimum, on the day of trial, the trial judge should have taken a moment to ensure Hood was mentally fit for trial on that day. "Even when a defendant is competent at the commencement of his trial, a trial court **must always** be alert to circumstances suggesting a change that would render the accused unable to meet the standards of competency to stand trial." *Drop v. Missouri*, 420 U.S. 162, 181, 95 S.Ct. 896, 908 (1975) (emphasis added).

The Mississippi Supreme Court actually suggests Sanders did not create a new rule that would trigger the Teague requirements. In *Goodin v. State*, 102 So.3d 1102 (Miss. 2012), the court applied Sanders to a 1999 conviction where the defendant pursued an ineffective assistance of counsel claim related to Rule 9.06.

Applying Sanders, the Court stated "counsel should have requested a competency hearing" and determined that counsel was "deficient" in this regard. Id. at 1119.

Due to the above and foregoing, Hood submits that the Teague holding with respect to retroactivity does not apply to this case. Sanders did not announce a new rule as suggested by Teague, rather it simply analyzed the direct and plain language used in Rule 9.06 and, at most, provided clarification. Therefore, this Court should find that the circuit court erred when it denied Hood's PCR motion and that the trial court failed to conduct a competency hearing pursuant to Rule 9.06, violating Hood's due process rights.

2. Even if Sanders announced a new rule, Hood's conviction was not finalized when it was announced and; therefore, it applies to Hood's 2007 Conviction.

The holding in Sanders was issued on May 28, 2009. The State asserts that Hood's

direct appeal was not pending when the Mississippi Supreme Court made its holding in Sanders. (Appellee's Brief at p. 8). The record is clear, however, that Hood's direct appeal was pending at the time Sanders was handed down. Elsewhere in its brief, the State acknowledges the Mississippi Supreme Court affirmed Hood's conviction on July 30, 2009, (Appellee's Brief at p. 2). Hood's motion for rehearing was denied on September 24, 2009, finalizing his conviction.

Our high court held the following: "When a decision of this Court results in a 'new rule,' that rule applies to all criminal cases still pending on direct review." *Manning v. State*, 924 So.2d 885, 898 (Miss. 2006) (quoting *Schiro v. Summerlin*, 542 U.S. 348, 351, 124 S.Ct. 2519, 2522 (2004)) (internal citation omitted). Further, "State convictions are final for purposes of retroactivity analysis when the availability of direct appeal to the state courts has been exhausted and the time for filing a petition for a writ of certiorari has elapsed or a timely filed petition has been finally denied." *Carr v. State*, 178 So.3d 320, 322 (Miss. 2013) (quoting *Beard v. Banks*, 542 U.S. 406, 411, 124 S.Ct. 2504, 2510 (2004)) (internal quotation omitted).

Accordingly, Hood submits that even if Sanders announced a new rule, it does apply to his 2007 conviction since his direct appeal was pending in the Mississipp. Supreme Court and his conviction was not yet finalized at the time the Sanders ruling was issued.

B. The trial court did not comply with the purpose and spirit of Sanders and the trial court's denial of Hood's PCR Motion should be reversed.

In the event that its "new rule" argument fails, the State boasts that the trial court complied with the purpose and spirit of Sanders. To bolster this position, the State asserts the completely unsupported claim that the trial judge relied upon Dr. Lott's mental evaluation report at Hood's trial. (Appellee's Brief at p. 12). The record is clear, however, that there was no mention of Dr. Lott's report or even Hood's mental fitness for trial at any point before, during, or after trial.

Our Supreme Court held the strict mandate of Rule 9.06 does not have to be enforced if the "purposes of Rule 9.06

[are] satisfied." *Hearn v. State*, 3 So.3d 722, 730 (Miss. 2003). Here, the State advocates the purpose of Rule 9.06 is satisfied "where a mental evaluation report with a finding that a defendant was competent to stand trial was made a part of the record considered by the trial court in the trial and sentencing of the defendant." (Appellee's Brief at p. 12). The State then proceeds to quote a portion of Sanders in an attempt to support this. It is important to remember that here, unlike Sanders, Dr. Lott did not testify at Hood's trial, and Dr. Lott was never subject to cross-examination. As in Sanders, Dr. Lott's report was filed in the circuit clerk's office, but it was never entered as evidence and not mentioned at Hood's trial. Although Dr. Lott's report is included in the record, the report cannot be relied upon as the sole evidence of Hood's competency.⁴

The State also proffers that our Supreme Court would have denied the defendant in *Jay v. State*, 25 So.3d 257 (Miss. 2010), relief if there was "evidence in the record that the trial court found Jay competent to stand trial based on a review of the psychiatrist's report." (Appellee's Brief at pp. 18-19). Once again, in the

⁴ Concerning the accuracy and credibility of Dr. Lott's report, Hood discussed the ambiguity, contradictions, and omissions at length in his Amended Brief. See Appellant's Amended Brief at pp. 37-39. Hood further notes that the State failed to respond to these issues.

case at bar, the record is void of any indication that the trial judge read or considered Dr. Lott's report prior to Hood's 2007 trial.

The State would like this Court to believe Hood's mental issues were merely surface, and they describe Hood as a "high functioning individual in the month prior to trial." (Appellee's Brief at p. 13). This simply was not the case. It is undisputed that the trial judge revoked Hood's bond after he was deemed a danger to himself. It is further undisputed that Hood was placed on suicide watch once his bail was revoked and, at a minimum, spent considerable time on and off of suicide watch up to and including the day of his trial. Moreover, it is undisputed Hood was placed on multiple psychiatric drugs leading up to his bond being revoked, yet Dr. Lott's report states he was not presently taking any medication. It is further undisputed that Hood informed Dr. Lott he had tried to commit suicide by overdosing on pills since his bond was revoked. It is undisputed that Dr. Lott never did his due diligence and followed up on these issues or reviewed any of Hood's past mental health records. It is further undisputed by the record that on the day of his trial, Hood was confused, erroneously believing he could 1. call witnesses at his sentencing; 2. be sent to a

facility in Hattiesburg for sex offenders; and, 3. accept a plea bargain after he had been convicted and sentenced. ⁵ In reference to the trial, it is undisputed Hood informed the trial judge he did not "understand some of it[6]" (Consolidated R. vol. 3 at 189, lines 11-12). Although the State claims Hood "clearly understood the procedures and spoke with clarity and purpose[7]" it offers no statements from the record to support this. (Appellee's Brief at p. 14).

Amazingly, the State argues that the medical records Hood attached to his PCR motion are "hearsay." (Appellee's Brief at p. 14). In so doing, the State fails to see that the medical records could have easily been authenticated at a proper competency hearing as Hood could have called the other doctors who examined him to testify, if a competency hearing had been held prior to his 2007 trial. It is beyond understanding how the State can assert that Hood's medical records "do not indicate incompetence to assist his attorney[8]" given Dr. Lott never reviewed them. ⁶ (Appellee's Brief at p. 14). The State further contends that the circuit court reviewed these medical records when it denied Hood's PCR motion (Appellee's Brief at p. 20), yet the circuit court's order does not reference them. (See R. 1-3).

⁵ See Consolidated R. vol. 3 at p. 183, lines 16-25; p. 187, lines 12-18; and, p. 189, lines 10-17.

⁶ See "INFORMATION REVIEWED" by Dr. Lott in Consolidated R. vol. 1 at p. 26.

The State proffers that, when denying Hood's PCR Motion, the Circuit Judge relied partly on "her own recollection of Hood demeanor and conduct at trial[...]" (Appellee's Brief at p. 20). At the time she ruled on Hood's PCR Motion, it had been nearly ten (10) years since Hood's trial. One must ask, is it really feasible that she was able to specifically recall Hood's single-day trial, much less his demeanor and conduct at trial?

While the State asserts "Hood was determined to be competent [to stand trial]" and that "[t]he judge, defense counsel, prosecutor and Hood knew that at the time of trial[...]" (Appellee's Brief at p. 16), it glosses over one important stressor. Dr. Lott, in his opinion, stated:

"[...] [A]ny complex legal material should be explained to [Hood] in simple and concrete terms."

(Consolidated R. vol. 1 at p. 32).

Though the State asserts that Mr. Walker, the prosecutor, and Hood "knew" Hood was competent to stand trial, the record is void of anything to prove this.⁷ Importantly, the State does not address the qualified portion of Dr. Lott's opinion.

⁷: See Appellants' Answer Brief at pp. 7, 23, 34, and 37; and Appellants' Answer Brief at pp. 10, 26, 30, and 35.

What is even more amazing than the State's unsupported assertions and its lack of reference to the record, is its attempt to place the order denying Hood's PCR Motion in a box, wrap it in glistening paper, and top it with a bow, all in its effort to get this Court to accept it as some type of retrospective competency hearing. Unfortunately for the State, this in no way fulfills the purpose and spirit of Rule 9.06 and the attending case laws. The State actually concedes that the only example of what satisfies the purpose of Rule 9.06 other than a competency hearing is when the psychiatrist who conducted the mental evaluation testifies at trial regarding the defendant's competency to stand trial. (Appellee's Brief at p. 19). It is clear from the record and undisputed by the State that Dr. Lett did not testify at Hood's trial. Accordingly, the "purposes" narrow exception to Rule 9.06 does not apply here.

Nevertheless, elsewhere in its brief, the State attempts to serve the order denying Hood's PCR motion as a retrospective competency hearing, citing *Pitchford v. State*, 240 So.3d 1061 (Miss. 2017)⁸. However, *Pitchford* in no way even suggests that a review of a PCR motion is a substitute

⁸ *Pitchford* is currently under appeal in the Federal Court for the Northern District of Mississippi. See *Terry Pitchford v. Hall*, 4:18cv2.

for a tangible competency hearing. The record is clear that a panel of the Mississippi Supreme Court allowed Hood to file his PCR motion in the circuit court to "pursue a due process claim on the lack of a competency hearing." (R.1). Stated differently the circuit court was to review whether Hood was entitled to a competency hearing prior to his 2007 trial. It would have actually been outside the scope of the order for the circuit court to have actually conducted a competency hearing. Indeed, the circuit court's order states, "no due process rights were violated." (R.3). That statement would appear to confirm the circuit court ~~did~~ not conduct a retrospective competency hearing when it denied Hood's PCR motion.

Contrary to what the State suggests, the holding in Pitchford, in accordance with the Fifth Circuit, observes that "the State should bear the burden of demonstrating that a meaningful retrospective competency hearing can be conducted." Pitchford, *supra*, at 1070. The State has wholeheartedly failed to do that here, as its argument is solely regarding the circuit court's denial of Hood's PCR motion as a substitute tangible competency hearing. Accordingly and respectfully, given the State has failed to show a meaningful retroactive

competency hearing is possible then, if this Court determines Hood's due process rights were violated, it must reverse Hood's conviction, vacate his sentence, and remand the case back to the circuit court for a competency hearing and a new trial should Hood be deemed competent to stand trial.

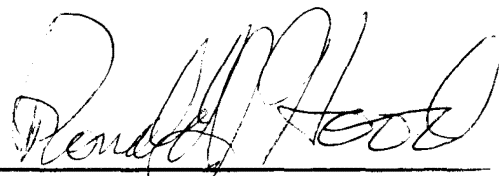
CONCLUSION

Due to the foregoing reasons, Hood submits that his due process rights were violated and the circuit court's denial of his post-conviction collateral relief should be reversed, along with his conviction, and his sentence should be vacated. Hood should then be sent back to the circuit court for a competency hearing and a new trial, if he is deemed competent.

WHEREFORE, PREMISES CONSIDERED, the Appellant, Ronald J. Hood, respectfully moves this Court to reverse his conviction, vacate his sentence, and remand this case back to the trial court for a competency hearing and, if found competent, a new trial.

RESPECTFULLY SUBMITTED,

This the 30th day of July, 2011.

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Ronald J. Hood
APPELLANT

CERTIFICATE OF SERVICE

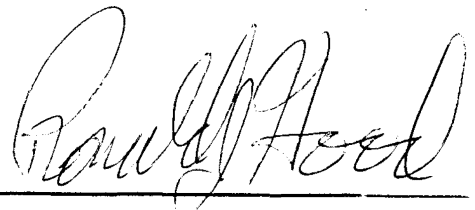
Let this hereby certify that, the undersigned,
has caused a true copy of the foregoing to be
mailed to the below listed persons, via the U.S.P.S.,
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