STATE OF WISCONSIN
SUPREME COURT

No. 2018AP183-CR

STATE OF WISCONSIN,

Plaintiff-Respondent,

v.

GENERAL GRANT WILSON,

Defendant-Appellant-Petitioner.

Petition for Review of a Decision of the Court of Appeals, District 1,
On Appeal from the Circuit Court for Milwaukee County,
Honorable M. Joseph Donald Presiding,
Circuit Court Case No. 1993 CF 931541

PETITION FOR REVIEW AND APPENDIX OF GENERAL GRANT WILSON

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This case presents an important opportunity for the Court to develop the law governing the prejudice requirement of an ineffective-assistance-of-counsel claim, both generally and in the specific, frequently arising context of a third-party-perpetrator defense.[1] The Court of Appeals divided here, with one of the three judges concluding that the defendant, General Grant Wilson, had not received a fair trial: Presiding Judge Brash was "persuaded that, but for the numerous, unreasonable errors of Wilson's trial counsel, there is a reasonable probability that the result of the proceeding would have been different." Pet. App. 32 (¶ 76) (dissent). In reaching the contrary conclusion, the majority misapprehended and misapplied the law of prejudice developed under *Strickland v. Washington*, 466 U.S. 668 (1984). This petition will demonstrate the propriety—importance, even—of this Court's granting review.

STATEMENT OF THE ISSUES

It is the combination of this case's ordinariness and extraordinariness that supports the Court's exercise of its discretion under Wis. Stat. § 809.62(1r).

On the one hand, the defendant was convicted of first-degree intentional homicide while possessing a dangerous weapon and attempted first-degree intentional homicide while possessing a dangerous weapon. He had sought to present a defense that a third party had committed the crime. In these respects, the case is routine, but that is a factor that weighs in *favor* of review: This Court should be about deciding not "unusual" or "unique" cases, but *representative* ones,

[1] In Wisconsin, such a defense most often goes under the name of *State v. Denny*, 120 Wis. 2d 614, 357 N.W.2d 12 (Ct. App. 1984).

thereby developing the law in ways that will be consequential.[2]

On the other hand, "the *magnitude* of [trial counsel's] deficiencies was extraordinary." Pet. App. 32 (¶ 75) (Brash, J., dissenting) (emphasis added and internal quotation marks omitted). Thus, this case lends itself especially well to a meaningful elaboration of the law guaranteeing effective assistance of counsel, both in the context of a third-party-perpetrator defense and more generally. In short, the Court has an instructive opportunity to develop the law governing when a court in a *Machner* hearing should find trial counsel's performance to have prejudiced the defendant under *Strickland*.[3]

More generally yet, the law that the Court of Appeals has pronounced here—in an opinion available for citation—is, in various respects, simply wrong. This is so both in particular statements and in the opinion's broader apprehension of what a defendant must do in order to establish prejudice under *Strickland* in the context of the deficient presentation of a third-party-perpetrator defense. Unless corrected, the opinion threatens to mislead future courts and litigants in the context of *Machner* hearings and possibly otherwise also

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[2] *Cf.* Joseph D. Kearney, "Remarks on the Wisconsin Court System," *Marquette Lawyer*, Spring 2005, at 50–51 (so maintaining and further noting as follows: "The *facts* of every case are unique. The way that a law-developing court undertakes its duty . . . is, in common-law fashion, by picking *a* case that seems to present *issues* that should be resolved and then deciding *that case*.") (emphasis of final phrase in original).

[3] The reference, of course, is to *State v. Machner*, 92 Wis. 2d 797, 285 N.W.2d 905 (Ct. App. 1979), which sets forth a number of principles concerning a proceeding in the trial court to consider an ineffective-assistance-of-counsel claim. *See*, *e.g.*, *State v. Sholar*, 2018 WI 53, 381 Wis. 2d 560, 912 N.W.2d 89.

(i.e., in the presentation of a *Denny* defense in the first place). This, too, counsels in favor of review.

In these circumstances, on the one hand, the specific issue presented is whether, in rejecting defendant's constitutional claims of ineffective assistance of counsel and affirming the circuit court's refusal to grant a new trial, the Court of Appeals correctly appreciated and applied the prejudice standard under *Strickland*; on the other hand (and at the same time), the more general context or circumstances of the case will ensure that a decision by this Court will develop the teachings and understandings available to courts and future litigants in an important area of constitutional criminal law.

STATEMENT OF THE CASE

1. This case has been before this Court previously, at the state's request. In *State v. Wilson*, 2015 WI 48, 362 Wis. 2d 193, 864 N.W.2d 52, the Court reversed the judgment of the Court of Appeals, which had reversed Wilson's convictions. On remand, the Court of Appeals turned to issues that it had reserved (as unnecessary to reach in light of its previous ruling in Wilson's favor), and it remanded to the circuit court for a *Machner* hearing. *See* Pet. App. 4 (¶ 10) (maj. op. below) & 17 (¶ 38) (dissent).

The focus of the hearing was whether Peter Kovac, Wilson's trial counsel, had provided constitutionally effective representation. The deficiency of the representation became well established. This included, most remarkably because entirely inexplicably, counsel's withdrawing a *successful* objection to the *key* testimony that linked Wilson to the crime—in a case where the defense was that of a third-party perpetrator unconnected with the defendant and where that

excluded-then-admitted testimony came from just such a third party, whom defendant believed to be involved in the crime. *See* Pet. App. 37. While it was good to get counsel's deficiency established on and for the record, it was no surprise to Wilson: After all, he had sat in prison without an appeal of his conviction for almost 20 years because this same lawyer had failed to file a notice of appeal.[4]

Nor was it helpful to Wilson. For the circuit court in the *Machner* proceeding nonetheless found no prejudice to Wilson from Kovac's trial deficiencies. This was so even though (a) witnesses at the *Machner* hearing provided evidence that, in Wilson's estimation, demonstrated how he would have satisfied the elements

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[4] *That* ineffectiveness had resulted in professional discipline of Kovac and, separately, in the restoration of Wilson's appeal rights, and it is the reason that this case concerns proceedings of some time ago, through no fault of Wilson. *See Public Reprimand of Peter J. Kovac*, 2008-OLR-05; Pet. App. 16 (¶ 35 n.1) (dissent) (citing the Court of Appeals' 2010 order restoring Wilson's appeal rights).

In light of Kovac's centrality to this case, it is appropriate to note that the discipline appears not to have had its intended effect. Since the 2008 discipline, Wilson's sole attorney in his trial for first-degree homicide has been the respondent in "successful" proceedings against him for professional misconduct at least four additional, different times. *See In re Disciplinary Proceedings Against Kovac*, 2012 WI 117, 344 Wis. 2d 522, 823 N.W.2d 371; *Office of Lawyer Regulation v. Kovac*, 2016 WI 62, 370 Wis. 2d 388, 881 N.W.2d 44; *Office of Lawyer Regulation v. Kovac*, 2020 WI 47, 391 Wis. 2d 719, 943 N.W.2d 504; *Office of Lawyer Regulation v. Kovac*, 2020 WI 58, 392 Wis. 2d 144, 944 N.W.2d 605. These prospective protections of the public (e.g., most recently, suspending Kovac's law license for five months) serve some general (if limited) purpose. The undersigned counsel suggests respectfully that the Court should be prepared here to provide the relatively retrospective relief (to order a new trial) that is the only remedy of any value to a defendant as ill served and prejudiced by an officer of the court as Wilson was by Kovac.

of a third-party-perpetrator defense if Kovac had provided effective representation; (b) additional materials were adduced tending to show how Kovac could have persuasively discredited Willie Friend to impeach his critical state testimony (it was the theory of the defense that Friend, a felon, had been involved in the murder); and (c) Kovac conceded on the stand that he had damaged Wilson's case by *going out of his way* to enable the state to get admitted at trial "pretty damning" hearsay (R.193:53). The circuit court denied the motion for a new trial.

2. On appeal, Wilson sought to demonstrate that Kovac's deficiencies had, in fact, cost him dearly—i.e., that they had prejudiced him. Two of the three judges disagreed, and the Court of Appeals thus ruled against Wilson.

Proceeding on the premise that Kovac had performed deficiently at trial, the court focused on prejudice.[5] It framed the "ultimate question" this way: "whether there was a substantial likelihood of a different outcome but for trial counsel's presumed deficient performance." Pet. App. 13 (¶ 29). It concluded that there was not, relying on such grounds as that the inconsistencies in the testimony of the state's key witness did not make his testimony "incredible" and that that witness's testimony, even "if disproven," might not have been "discount[ed] . . . *entirely*" by the jury. Pet. App. 10–11 (¶ 25) (emphasis added).

[5] *See* Pet. App. 7 (¶ 18) ("We assume without deciding that trial counsel's performance was deficient . . . ."). The circuit court in the *Machner* hearing left no doubt on the point, finding (and detailing) that Kovac's representation had been "deficient in various respects." Pet. App. 37.

The dissent engaged in a lengthier analysis than did the majority. It concluded "the cumulative effect of [Kovac's] deficiencies was prejudicial to Wilson's defense and, had they not been committed, there is a reasonable probability that the outcome of Wilson's trial would have been different." Pet. App. 15 (¶ 32) (Brash, J., dissenting). The dissent sought to demonstrate that "Attorney Kovac did not adequately investigate and prepare [Wilson's] third-party perpetrator defense before trial" and that Kovac's "other deficiencies" were grave, such that Wilson had suffered prejudice. Pet App. 20 (¶ 43), 27 (capitalization removed). This included Kovac's withdrawing his objection to key evidence against Wilson: specifically, testimony by Willie Friend that the victim "told Friend that Wilson had tried to run her off the road several hours before the murder, then pointed a gun at her and told her that if he saw her with Friend again, he was going to kill her." Pet. App. 27 (¶ 60) (dissent). Kovac's action was inexplicable in any way consistent with competent representation, in Judge Brash's estimation: For Kovac made the move "[a]fter the circuit court ruled *in favor of the defense excluding the statement*." *Id*. (emphasis in original).

To give just one other example here, the dissent set forth as another "importan[t]" and prejudicial deficiency that "Attorney Kovac never *told the jury* that the .44 caliber revolver Wilson admitted previously owning and bartering away *was not the same make* as the .44 caliber revolver that killed [the victim]." Pet. App. 29 (¶ 68) (dissent) (emphasis in original). Judge Brash summed up his conclusion: "Attorney Kovac's numerous errors and omissions, both large and small, prejudiced the defense to an extent that it rendered the reliability of this proceeding suspect. Stated more simply, Wilson did not receive a fair trial." Pet. App. 32 (¶ 75) (dissent).

GROUNDS FOR REVIEW

This case comes within the criteria of subsections (a), (c)(3), and (d) of Wis. Stat. § 809.62(1r), as demonstrated below.

ARGUMENT

THIS CASE PRESENTS AN IMPORTANT OPPORTUNITY FOR THE COURT TO DEVELOP THE LAW GOVERNING PREJUDICE IN CLAIMS OF INEFFECTIVE ASSISTANCE OF COUNSEL, BOTH GENERALLY AND IN THE SPECIFIC, SIGNIFICANT CONTEXT OF A THIRD-PARTY-PERPETRATOR DEFENSE.

This case merits the Court's review. It is not merely that the *dissent* below was correct in its application of the law to the facts here (although that is true). It is also that, to conclude otherwise, in a case available for citation, the majority misapprehended and misstated the law of prejudice with respect to *Strickland* claims. Finally, and most importantly, the case presents an opportunity for the Court to develop the law as to what is required of counsel in order to effectively investigate and present a defense of interest and significance in many criminal prosecutions: that of a third-party perpetrator (sometimes called a *Denny* defense).

First, the decision below is wrong. The dissent demonstrates the bottom-line incorrectness of the majority opinion: "[B]ut for the numerous, unreasonable errors of Wilson's trial counsel, there is a reasonable probability that the result of the proceeding would have been different." Pet. App. 32 (¶ 76) (dissent). Judge Brash was right to note both the numerosity and the *unreasonableness* of Kovac's errors.

For the leading example, there was no trial strategy, present at the time or articulable later, that could support withdrawing a *successful* objection to the state's *key* testimony against Wilson. Perhaps recognizing this, the majority of the Court of Appeals imagines that the testimony would have been properly admitted even over an unwithdrawn objection, on the basis of the "excited utterance" exception to hearsay. Pet. App. 12–13 (¶ 28). To borrow the majority's adverb but to apply the law correctly, this is "plainly" wrong: As Judge Brash explains, the exception is wholly inapplicable—as even the original trial court had ruled (before Kovac gave away the winnings on the point, receiving nothing in exchange). *See* Pet. App. 28–29 (¶¶ 63–65) (dissent). Kovac's decision was both incompetent *and* prejudicial: "The State went on to repeatedly use the statement against Wilson," as Judge Brash lays out. Pet. App. 28 (¶ 61).

To be sure, that is only an *example*, albeit the leading one.[6] Kovac's deficiencies, more broadly, are well catalogued by Judge Brash—as is the harm wrought upon Wilson. *See* Pet. App. 29–32 (¶¶ 67–74) (dissent). The appellate courts of this state should not regard it as their work to maintain that the deprivation of the freedom of an individual, even (or especially) on a conviction of first-degree murder, was somehow constitutionally fair when that individual received, in the state's criminal trial courts, the sort of legal representation provided here.

[6] *See* Pet. App. 28 (¶ 62) (dissent) ("[T]his emotionally charged evidence damaged Wilson's defense because it was the only evidence that Wilson ever threatened Maric and it bolstered the State's theory that Wilson killed Maric and attempted to kill Friend in a crime of passion.").

Second, the Court of Appeals got wrong not only the result but the law of prejudice more generally. In some respects, it did that simply in its analysis. It recapitulated the evidence against Wilson, however indirect it may have been, asserting, for example, that the result here must have been fair because of the testimony of one witness (Carol Kidd-Edwards). Pet. App. 11–12 (¶¶ 26–27). The opinion was reduced to shrugging off (ignoring, really) the incisive point made by the dissent about the evidence, *missing* because of Kovac's ineffectiveness, concerning the state's *key* witness (Friend)—specifically, that it was harmful to Wilson that the testimony of this pimp would be received without that evidence:

> . . . Friend's credibility was paramount to the State's case: he was the person who identified Wilson as the shooter; he provided the connection of the car seen at the shooting to Wilson; and he was the one who provided the motive for Wilson to commit the shootings, based on the purported statement of Maric [the victim] that Wilson had threatened to kill Maric and Friend if he saw them together. In contrast, Kidd-Edwards, the State's witness who both the circuit court and the Majority found compelling, could not identify the shooter or corroborate the license plate.

Pet. App. 31 (¶ 73) (dissent). With respect, it is one thing to construe the evidence in favor of the state after it has secured a judgment of conviction. It is another thing, but perhaps close enough, to place weight on testimony of a witness like Kidd-Edwards (unable to identify Wilson) as corroborating certain *incidental* aspects of the testimony of the state's only witness (Friend, who had never met

Wilson) purporting to tie Wilson to the crime. But it is still another thing—altogether—thus to reweigh the existing testimony, in the way done and the context here (i.e., in considering prejudice), when defense counsel failed in conducting an investigation and in presenting to the trial court evidence that would have shown the motive and opportunity of that key witness (again, Friend) *himself* to have been involved in the crime. The last of these is grossly unfair and violates the applicable constitutional standard.

More importantly (for those beyond Wilson), in the process, the Court of Appeals seems to have nudged the standard for evaluating prejudice in an erroneously more onerous direction. "The ultimate question," it stated, "is whether there was a substantial likelihood of a different outcome but for trial counsel's presumed deficient performance." Pet. App. 29 (¶ 13). The ordinary and standard phrasing is that "*Strickland* asks whether it is 'reasonably likely' the result would have been different." *Harrington v. Richter*, 562 U.S. 86, 111 (2011) (quoting *Strickland*, 466 U.S. at 696). "This does *not* require a showing that counsel's actions 'more likely than not altered the outcome.'" *Id*. at 111–12 (quoting 466 U.S. at 693) (emphasis added). While common-law terms such as "reasonably" and "substantial" do not lend themselves to mathematical exposition or translation, and one may find both terms used by the Supreme Court, *see*, *e.g.*, *id*., the combination of the Court of Appeals' conception of the "ultimate" question and its *application* of the standard, however articulated, set the bar inappropriately high, for the court seems to have demanded a showing under "a more-probable-than-not standard," contrary to the law. *Id*.

This Court should not permit such a misapprehension and consequent misapplication to

stand. It is true that this is recommended to be an unpublished opinion, but that is no firewall. Such "an unpublished opinion . . . may be cited for its persuasive value." Wis. Stat. § 809.23(3)(b). It is thus to be distinguished, as the Court knows, from a "per curiam opinion, memorandum opinion, [or] summary disposition order." *Id*. And the fact that it would be cited only "for its persuasive value" and not as binding precedent matters only in degree. What is a lawyer supposed to do when the case is cited against his or her client: explain in this sort of detail why the opinion of the Court of Appeals is unpersuasive? In short, the availability of the decision below not only for instruction of litigants (as is true of all cases) but for citation, to and by courts hereafter, counsels in favor of this Court's review.

Finally, and quite significantly, the underlying defense that Kovac ineptly mishandled here is of broad importance. To be sure, there may be disagreement whether it should be made easier yet (than under the current law of Wisconsin and other jurisdictions) to introduce a third-party-perpetrator defense. *See generally* David S. Schwartz & Chelsey B. Metcalf, *Disfavored Treatment of Third-Party Guilt Evidence*, 2016 Wis. L. Rev. 337. Yet all will acknowledge this pertinent fact: "In many, if not most, criminal trials, the factual dispute between the prosecution and defense does not concern whether a crime has been committed, but who has committed it." *Id*. at 341.

One should be careful in understanding that statement: In our system of justice, it is not required that the defendant *disprove* that he committed a crime. Yet it is not too much to say that the majority opinion below does not convey an adequate appreciation of how this basic truth applies in the context at hand. For example, it acknowledges that "Wilson is correct that there are

inconsistencies in the record about what occurred during the hours before the shooting *but*"—it then immediately maintains—"none of them make Friend's testimony incredible or, if disproven, that a reasonable jury could only discount his account entirely." Pet. App. 10–11 (¶ 25) (emphasis added). As the law is *correctly* understood, even under a third-party-perpetrator (or *Denny*) defense, it should have been available to Wilson to use these conceded "inconsistencies"—amplified by the further evidence, going to Friend's credibility, that was available to a competent lawyer—to establish *reasonable doubt* about the state's case. Wilson was not required to "disprov[e]" that case, in the Court of Appeals' telling word (in an admittedly hard to parse sentence)—e.g., to *prove* that someone else (whether Friend or one of his associates) had committed the crime. Contrast—and, regrettably, compare—the just-quoted statement by the Court of Appeals with the statement by the South Carolina Supreme Court, quoted and *rejected* by the U.S. Supreme Court, that "'[i]n view of the strong evidence of appellant's guilt[, . . .] the proffered [third-party-perpetrator] evidence . . . did not raise a reasonable inference as to appellant's own innocence.'" *Holmes v. South Carolina*, 547 U.S. 319, 328–29 (2006) (certain internal quotation marks omitted). The high court made clear that that state court had "radically changed and extended the rule" under which a trial court might exclude third-party-perpetrator evidence and that it had thereby contravened the U.S. Constitution. *Id.* at 328–31. The Court of Appeals here is not far away, if at all, from the same basic mistake that the South Carolina Supreme Court had made in *Holmes*, before its correction by the U.S. Supreme Court.

The dissent below, by contrast, understood the substantive law of third-party-perpetrator defenses and

its connection with an ineffective-assistance-of-counsel claim (Pet. App. 26):

> ¶56 Another factor to consider in a *Denny* analysis is that "[o]verwhelming evidence against the defendant may not serve as the basis for excluding evidence of a third party's opportunity" to commit the crime. *Wilson*, 362 Wis. 2d 193, ¶ 69. "[B]y evaluating the strength of only one party's evidence, no logical conclusion can be reached regarding the strength of contrary evidence offered by the other side to rebut or cast doubt." *See Wilson*, 362 Wis. 2d 193, ¶69 (quoting *Holmes v. South Carolina*, 547 U.S. 319, 331 (2006)).
>
> ¶57 This legal framework under which the additional evidence adduced at the *Machner* hearing is analyzed is key. We must focus on the probative value of the evidence *to the defense*; that is, we look at whether the evidence would have helped cast reasonable doubt on the State's case. *See Wilson*, 362 Wis. 2d 193, ¶ 69. Clearly, the third-party perpetrator evidence would have helped to cast doubt on the State's narrative that this was a crime of passion committed by a spurned lover.

In short, in the majority and dissent, we have not some mere divergence in the application of agreed-upon law to established facts. Rather, we have—and so this Court has and the people of Wisconsin have, even if it is most important to the undersigned that Wilson has—a majority of the Court of Appeals whose understanding of the defense's responsibility and thus of defense counsel's role cannot be squared with precedent of the Supreme Court of the United Sates.

In any event, to make the *crucial* aspect of this final point, any difficulty of successfully introducing a third-party-perpetrator defense does not mean that counsel do not frequently seek to do so or, at any rate, consider doing so. The appellate cases alone in the state reveal this frequency, and one sees in them that ineffective-assistance-of-counsel claims often follow.[7]

In short, this case presents an important opportunity to develop the law—applicable then hereafter in a material number of cases—of what the Sixth Amendment and Article I, section 7 of the state constitution require for counsel to be lawfully effective. The justice system in Wisconsin will benefit from the sort of "particularization" that is the hallmark of the common-law process (even in constitutional criminal cases) and that this Court is uniquely positioned to provide. *Cf.* Geoffrey C. Hazard, Jr., *A General Theory of State-Court Jurisdiction*, 1965 Sup. Ct. Rev. 241, 283 (noting that the generality of the test for personal jurisdiction requires "arbitrary particularization" by the Supreme Court in individual cases in order to give meaningful guidance).[8]

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[7] *See*, *e.g.*, *State v. Griffin*, 2019 WI App 49, 388 Wis. 2d 581, 933 N.W.2d 681. It would be possible to list *numerous* other examples, all available in LEXIS and Westlaw, in the Court of Appeals' *unpublished* decisions in the past several years, and among those would be decisions demonstrating the more specific ineffective-assistance-of-counsel aspect of the statement in the text. While to do so would not be to cite any one of those "as precedent or authority," Wis. Stat. § 809.23(3)(a), or even "for its persuasive value," § 809.23(3)(b), but rather only as an example of the asserted *fact* that defense counsel often seek to introduce a *Denny* defense or, at any rate, consider doing so, it is also not necessary to list the cases. For the importance of—even in the mere sense of the frequent interest in, on the part of the defense—a third-party-perpetrator defense is incontestable.

[8] One is reminded of Justice Crooks's concurrence in *State v. Jenkins*, 2014 WI 59, 355 Wis. 2d 180, 848 N.W.2d 786. Part II of

CONCLUSION

For the reasons stated, the petition for review should be granted.

Respectfully submitted,

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that thoughtful exposition suggests the importance of the Court's taking the opportunity to clarify or particularize how the *general* standard of prejudice under *Strickland* applies in specific situations—the importance arising from the frequency of the situation. In *Jenkins*, that situation or context was that of an uncalled witness; here, of course, it is that of a third-party-perpetrator defense.

FORM AND LENGTH CERTIFICATION

I hereby certify that this Petition for Review conforms to the rules contained in § 809.62(4) and § 809.19(8)(b) and (d) for a petition and appendix produced with a proportional serif font. The length of this Petition for Review is 4,179 words.

Electronically signed by Joseph D. Kearney
Joseph D. Kearney

ELECTRONIC FILING CERTIFICATION

I hereby certify that the electronic copy of this Petition for Review is identical to the text of the paper copy.

Electronically signed by Joseph D. Kearney
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CERTIFICATE OF SERVICE

I hereby certify that I will cause three copies of this Petition for Review and Appendix to be served upon opposing counsel by first-class mail, postage prepaid, at the addresses below:

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February 10, 2021