IN THE
INDIANA SUPREME COURT

No. 23S-OR-311

State of Indiana ex rel. Richard Allen, *Relator*, v. Carroll Circuit Court, and the Honorable Frances C. Gull, Special Judge. *Respondent*.	Original Action from the Carroll Circuit Court, Trial No. 08C01-2210-MR-1

INDIANA ATTORNEY GENERAL'S RESPONSE TO RELATOR RICHARD ALLEN'S PETITION FOR A WRIT OF MANDAMUS

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Indiana Attorney General Todd Rokita, pursuant to Rule 3(F) of the Indiana Rules of Procedure for Original Actions, files his Response to Allen's Verified Petition for Writ of Mandamus and Prohibition.

Background

In 2017, two teen girls were murdered near the Monon High Bridge trail in Delphi, Indiana. Richard Allen was charged with the murders on October 28, 2022 (R1 5-6). On November 14, 2022, Special Judge Francis Gull appointed Bradley Rozzi and Andrew Baldwin to represent Allen (R1 8). In October 2023, discovery subject to a protective order was leaked to the public (R1 225). On October 12, 2023, Attorney Rozzi wrote to the court acknowledging that the defense team was the source of the leak and arguing that disqualification of Attorneys Rozzi and Baldwin was not the appropriate remedy (R1 214-20). Judge Gull set a hearing for October 19, 2023, "to discuss the upcoming hearing on October 31, 2023, and other matters which have arisen" (R1 29). Baldwin retained an attorney for the hearing, and that attorney filed a Memorandum Regarding Possible Disqualification or Sanctions (R1 233-37).

At a chamber's meeting before the hearing, Judge Gull informed Baldwin and Rozzi of her "concerns regarding the defense team and the totality of the circumstances surrounding your representation of Mr. Allen" (SR 15). Judge Gull outlined her concerns:

- Improper comments to the public: After stating they would not talk about the case, Baldwin and Rozzi issued a press release that was potentially violative of the ethics rules.
- Conflict of Interest: Rozzi filed a tort claim on Allen's behalf against the DOC.
- Protective order violation: Baldwin negligently released discovery to Brandon Woodhouse who disseminated it to the public. Baldwin did not alert the court or the State to the release.
- Filing motions with inaccuracies and falsehoods: The pleadings regarding safekeeping Allen in the DOC contained proven false information.
- Protective order violation: Baldwin was the source of more leaked discovery, which spawned a criminal investigation and may have resulted in a suicide.

(SR. 15-17). Judge Gull found that Baldwin and Rozzi had demonstrated "gross negligence and incompetence" in representing Allen (SR. 17).

Judge Gull stated that she did not "want to say this in open court" but would if she had to (SR 18-19). Judge Gull confirmed that if Baldwin and Rozzi did not withdraw, she would remove them (SR 19). After consultation with Allen, Baldwin and Rozzi chose to withdraw (SR 21-23). When withdrawing their appearances, Baldwin and Rozzi claimed it was unfair because they were forced between being accused of misconduct in open court or withdrawing (SR18-23). In open court without Baldwin and Rozzi present, Judge Gull announced that they had withdrawn (R2 6).

Rozzi tendered two documents on October 25, 2023: a notice that he was still Allen's attorney and a motion to disqualify Judge Gull (R1 226-46). Judge Gull took no action on these filings because Rozzi was "no longer counsel of record" (R1 34). On October 27, 2023, Baldwin's attorney, David Hennessy, filed a motion to reconsider claiming that there had been "no valid motions to withdraw by appointed counsel" (R2 10-11). On October 27, 2023, Judge Gull appointed two new attorneys to represent Allen (R1 33).[1]

At a hearing on October 31, 2023. Baldwin and Rozzi were present, having tendered appearances the day before (R2 16-19). Hennessy also appeared for Baldwin (R2 29). Baldwin or Rozzi did not attempt to present evidence to rebut Judge Gull's factual findings. Finding that nothing had altered the court's concerns about counsels' gross negligence, Judge Gull disqualified Baldwin and Rozzi from representing Allen (R1 38; R2 24-26). Hennessy withdrew his appearance that day (R1 36).

No attempt was made to appeal Judge Gull's order. On November 6, 2023, Attorneys Cara Wieneke and Mark Leeman filed a petition for writ of mandamus with this Court asking the Court to order the trial court to reinstate attorneys Baldwin and Rozzi, to order the trial held within 70 days of the granting of the writ,

[1] Amicus Indiana Public Defender's Council argues that the procedure for selecting successor counsel was improper. But this claim is not raised by Allen and is unavailable for review. *See Blackford v. Welborn Clinic*, 172 N.E.3d 1219, 1222 n.1 (Ind. 2021).

and to remove Judge Gull. Pet. at 14.[2]

Argument

An original action is a limited remedy governed by strict procedural rules. "Original actions are viewed with disfavor and may not be used as substitutes for appeals." Ind. Original Action Rule 1(C); *see State ex rel. Seal v. Madison Super. Ct. No. 3*, 909 N.E.2d 994, 995 (Ind. 2009). Before a writ "will be entertained," the relator must raise the question by written motion to the trial court. Orig. Act. 2(A). If remedy "by way of appeal is full and adequate," a party may not invoke the jurisdiction of the Court under the original action rules. *State ex rel. Pebblecreek, Inc. v. Clark Cir. Ct.*, 438 N.E.2d 984, 985 (Ind. 1982); Orig. Act. 3(A)(6). "A writ of mandamus will not issue unless the relator has a clear and unquestioned right to relief and the respondents have failed to perform a clear, absolute, and imperative duty imposed by law." *Seal*, 909 N.E.2d at 995; Orig. Act. 2(A).

I.
The request that the Court reinstate Baldwin and Rozzi as Allen's court-appointed attorneys is inappropriate for a writ.

A writ of mandamus reinstating Allen's former attorneys is not presently warranted. The conditions precedent for a writ are not satisfied as the claim was not clearly presented to the trial court and a remedy by appeal is adequate. Even

[2] Allen includes materials—Exhibits L, U, and V—in the Record of Proceedings that were not "filed, tendered for filing, or entered in the respondent court." Orig. Act. 3(C). This Court should strike or disregard these exhibits. *See Turner v. State*, 508 N.E.2d 541, 543 (Ind. 1987) (striking material on appeal that was not part of the record in the trial court).

were the Court to review the merits of Allen's request, the record is not sufficiently developed for the Court to resolve the question.

A. Appeal is both adequate and preferred to review whether a trial court abused its discretion in removing counsel.

Allen did not seek interlocutory appeal of either the trial court's order granting withdrawal of counsel or its subsequent order declining to allow counsel to appear pro bono (R1 30-39). The record does not indicate that Allen asked his newly appointed counsel to appeal, nor does relator explain why original-action counsel could not file a limited appearance to seek certification of the court's order, as counsel did to file motions in preparation of this action (R1 38). The writ of mandamus cannot be used as a substitute for appeal. *State ex rel. Beatty v. Nichols*, 120 N.E.2d 407, 408 (Ind. 1954). This decision could have been appealed.

Disqualification of counsel can be required, or it can be at the discretion of the trial court. The extraordinary remedy of a writ "is not available where the matter is within the discretion of the trial court." *State ex rel. Woodford v. Marion Super. Ct.*, 655 N.E.2d 63, 66 (Ind. 1995). "An action for mandate cannot be employed to adjudicate and establish a right or to define and impose a duty." *State ex rel. Fadell v. Porter Super. Ct.*, 475 N.E.2d 310, 312 (Ind. 1985). Though this Court has reviewed disqualification of counsel through original actions, the Court has not issued a writ to reverse a trial court's discretionary removal of counsel but has issued writs where counsel's continued representation exceeded statutory authority. *See, e.g., State ex rel. Kirtz v. Delaware Cir. Ct. No. 5*, 916 N.E.2d 658 (Ind. 2009) (granting writ to disqualify special prosecutor under statute); *State ex*

rel. Sendak v. Marion Super. Ct., 373 N.E.2d 145, 147 (Ind. 1978) (granting writ to remove private counsel retained for state agency in violation of statute). *Cf. State ex rel. Jones v. Knox Super. Ct.*, 728 N.E.2d 133, 133 (Ind. 2000) (denying writ to reinstate disqualified attorneys where attorneys requested to withdraw if not granted a certain motion). But appellate courts have reviewed discretionary removal of counsel through interlocutory appeal. *See Robertson v. Wittenmyer*, 736 N.E.2d 804, 805 (Ind. Ct. App. 2000) (reviewing disqualification of counsel for conflict of interest); *T.C.H. v. State*, 714 N.E.2d 1162, 1164 & n.1 (Ind. Ct. App. 1999) (same). Removal here was at the discretion of the trial court, so mandamus is inappropriate.

B. Allen does not identify an absolute duty to reject counsels' withdrawal or to permit them to re-initiate representation.

The law does not place an absolute duty upon courts not to interfere with the attorney-client relationship, but it bars arbitrary and unjustified interference. Allen contends that Respondent "acted to terminate the attorney-client relationship when she had an absolute duty to refrain from doing so" (Relator Br.16). But Allen does not identify the origin of this absolute duty. Allen's brief does not contain the verbatim statement of "the relevant parts of all cases, statutes, and other authorities relied upon" required by the rules. Orig. Act. R. 3(B). Such a statement is necessary to define the source and scope of the duty that Allen seeks to mandate. A trial court's authority to remove counsel is more nuanced and less absolute than Allen suggests.

1. The right to choose counsel or continue representation is not absolute.

The Sixth Amendment guarantees every defendant the assistance of counsel. *United States v. Gonzalez-Lopez*, 548 U.S. 140, 145 (2006). Those who do not need counsel appointed also have the constitutional right to choose counsel. *Id.; United States v. Balsiger*, 910 F.3d 942, 949 (7th Cir. 2018). But indigent defendants do not have the right to choose appointed counsel. *Moore v. State*, 557 N.E.2d 665, 668 (Ind. 1990). The United States Supreme Court has not recognized—for appointed or retained counsel—a distinct right to continuity of representation, and the Court has rejected a constitutional right to a meaningful relationship with counsel. *Morris v. Slappy*, 461 U.S. 1, 13–14 (1983). But "the Sixth Amendment's purpose of ensuring a fair trial… imposes a baseline requirement of competence on whatever lawyer is chosen or appointed." *Id*. at 148.

The right to choose counsel is not absolute. "[W]hile the right to select and be represented by one's preferred attorney is comprehended by the Sixth Amendment, the essential aim of the Amendment is to guarantee an effective advocate for each criminal defendant rather than to ensure that a defendant will inexorably be represented by the lawyer whom he prefers." *Wheat v. United States*, 486 U.S. 153, 159 (1988). But for retained counsel, courts must recognize a presumption in favor of the defendant's counsel of choice. *Id*. at 164.

Indiana has not addressed whether the distinction between retained and appointed counsel alters a court's authority to substitute counsel, and authority is mixed in other jurisdictions. *Compare Daniels v. Lafler*, 501 F.3d 735,738-40 (6th

Cir. 2007), *with Harling v. United States*, 387 A.2d 1101, 1105 (D.C. 1978). The Colorado Supreme Court recently held that indigent defendants have no constitutional right to continued representation by appointed counsel. *People v. Rainey*, 527 P.3d 387, 393-95 (Colo. 2023). The court found that any right to continuity of counsel must flow from the right to choose counsel, which indigent defendants lack. *Id.* at 393. But the court recognized that indigent defendants have "an interest in continued representation by [appointed] counsel if they can demonstrate that prejudice would result from substitution with a different court-appointed attorney." *Id.* at 393. Trial courts must give "great weight" to a defendant's preference. *Id.* at 394. Whether requiring a presumption or weighty consideration, trial courts must weigh a defendant's preference for representation against the circumstances favoring disqualification.

2. The right to counsel must be balanced with the need for a fair trial.

Contrary to Allen's claims, more than two circumstances may require a court to interfere with a defendant's preference for counsel. As Allen recognizes, a defendant cannot insist upon counsel who is not admitted to practice. *Wheat*, 486 U.S. at 159. And a court may act to remove counsel when the representation creates an actual or "serious potential for" a conflict of interest, including refusing to permit the defendant to waive the conflict. *Id.* at 162-64. But these are not the only circumstances that allow interference with preferred counsel.

Counsel's conduct or personal circumstances may justify removal. "Gross incompetence or physical incapacity of counsel, or contumacious conduct that

cannot be cured by a citation for contempt may justify the court's removal of an attorney, even over the defendant's objection." *Harling*, 387 A.2d at 1105. "A trial court may disqualify an attorney for a violation of the Rules of Professional Conduct that arises from the attorney's representation before the court." *Cincinnati Ins. Co. v. Wills*, 717 N.E.2d 151, 154 (Ind. 1999). And a defendant may not "insist on the counsel of an attorney who has a previous or ongoing relationship with an opposing party, even when the opposing party is the Government." *Wheat*, 486 U.S. at 159; *see State v. Romero,* 578 N.E.2d 673, 676–77 (Ind. 1991) (holding defense counsel should be disqualified where representation violated duty of confidence to former client, the State).

The need for efficient administration of justice may require removal. *See Nix v. State*, 212 N.E.3d 194 (Ind. Ct. App. 2023) (finding no error in replacing preferred counsel who was indefinitely unavailable due to illness). And other rulings may deprive a defendant of his preference. "[W]hile the denial of a continuance may infringe upon the defendant's right to counsel of choice ... 'only an unreasoning and arbitrary insistence upon expeditiousness in the face of a justifiable request for delay violates the right to the assistance of counsel.'" *United States v. Carrera*, 259 F.3d 818, 825 (7th Cir. 2001) (quoting *Morris*, 461 U.S. at 11-12); *see also Lewis v. State*, 730 N.E.2d 686, 689 (Ind. 2000).

Courts must also balance the needs of the public and victims. "[T]he general public and the victims of crime also have an interest in the even-handed administration of justice." *Romero*, 578 N.E.2d at 676. Trial courts have the

discretion to balance these interests with the defendant's desire to be represented by his preferred counsel. *Wheat*, 486 U.S. at 161-63; *see also United States v. Gearhart*, 576 F.3d 459, 463 (7th Cir. 2009) ("We review the disqualification of counsel for abuse of discretion."); *Duff v. Rockey*, 180 N.E.3d 954, 956 (Ind. Ct. App. 2022) (same). Though varied interests may necessitate overriding a defendant's preference, disqualification is an extreme remedy that should only be used "when a court deems it reasonably necessary to ensure the integrity of the fact-finding process, the fairness or appearance of fairness of trial, the orderly or efficient administration of justice, or public trust or confidence in the criminal justice system." *Rainey*, 527 P.3d at 394 (cleaned up).

C. The lack of record prevents review of counsel's disqualification.

Defense counsels' withdrawal truncated the proceedings, and the present record prohibits complete review of whether the trial court's concerns justified substitution of counsel. In chambers prior to the October 19 hearing, the court listed reasons it felt counsel should be disqualified that it intended to address in the hearing (SR 13-17). The prosecutor was prepared to present evidence from the leak investigation (SR 8-9, 13-17). But this hearing did not occur because defense counsel withdrew rather than challenge the factual allegations at that time (SR 21-23). At the October 31 hearing where Baldwin and Rozzi attempted to appear for Allen and had their own counsel, no additional evidence was offered or arguments made to rebut the court's allegations (R2 29).

Respondent raised concerns that *could* warrant disqualification depending on the circumstances. The court's concerns raised questions regarding counsels' compliance with professional ethics and ability to provide Allen effective representation (SR 13-18). After the State sought a gag order, counsel had assured the court they did not intend to try the case in the media but then issued a detailed press release challenging specific evidence that the court believed violated Professional Conduct Rule 3.6 (SR 15-16). The restriction on publicly commenting on specific evidence and related limits on pretrial publicity exist to protect the defendant's right to a fair trial and the availability of an impartial jury. *See In re Litz*, 721 N.E.2d 258, 259 (Ind. 1999).

The court expressed concerns about counsels' candor. Baldwin informed no one that a defense outline had been sent to a third party for months until the State discovered it (SR 16). The court noted prior filings appeared to make factual allegations without foundation, which were then disproven (SR 16-17). This record does not contain the transcripts necessary to evaluate these concerns (SR 16-17). But the concerns raise potential ethical issues and concerns for competent representation. *See Outback Steakhouse of Florida, Inc. v. Markley*, 856 N.E.2d 65, 85 (Ind. 2006) (noting attorneys may not make false or misleading statements to the tribunal and that such conduct may be prejudicial to the administration of justice).

Counsel's conduct could implicate a conflict of interest or endanger Allen's ability to secure an impartial jury. Defense counsel permitted two separate leaks of protected material, including graphic crime scene images. Public dissemination of

graphic crime scene images could inflame prejudice against Allen. Because of the extraordinary public attention on this trial, the court imposed a strict protective order on all discovery (R1 50-51). The record contains incomplete and inconsistent information regarding the extent of the leaks and counsels' role in them. An affidavit from a friend and former employee of Baldwin's claims responsibility for taking the photos without counsel's knowledge, but a letter from counsel to the court indicates that counsel regularly consulted the same friend about the case and defense strategy (R1 214-15; R2 33). It's unclear whether the friend was given access to protected discovery or privileged information during these consultations. The record also does not reveal what law enforcement learned about the extent of the leak or counsels' role in it, and the investigation appears to be ongoing. Investigations into and potential liability for counsel's conduct during representation can give rise to a conflict of interest requiring removal. *See United States v. Greig*, 967 F.2d 1018, 1022-24 (5th Cir. 1992) (collecting cases). The court also expressed concern that counsel obtained a financial interest in the proceedings by filing a notice of tort claim related to Allen's pretrial confinement (SR 16). Whether circumstances exist that would divide counsel's loyalty between Allen and their own interests is unclear.

The record is also inadequate for full consideration of Allen's preferences. The record contains expressions of Allen's desire to retain Baldwin and Rozzi after being informed of the leak (R1 43; R2 24). But the record does not show what Allen knew or understood regarding the leak, the court's other concerns about counsel's

competence, how those matters impacted his ability to obtain a fair trial, or the alternatives available to him. Taken as true, the existing assertions of Allen's preference are insufficient to determine that he is making an informed decision. "[T]he presumption of deference to the defendant's choice is strengthened by confidence that it is an informed and individual choice by the defendant." *Latta v. State*, 743 N.E.2d 1121, 1130 (Ind. 2001). Inquiry and advisements from the court are needed to ensure Allen understands the "risks and gains" of his choice. *Id.*

The court's discretionary decision could be reviewed on appeal with a complete record, but the limited review in this action is inappropriate. Courts have discretion to remove counsel for "gross incompetence" or inappropriate conduct that cannot be adequately addressed through contempt. *See, e.g., Lane v. State*, 80 So. 3d 280, 299 (Ala. Crim. App. 2010); *People v. Coones*, 550 N.W.2d 600, 603 (Mich. Ct. App. 1996); *Harling*, 387 A.2d at 1105. This requires more than general concerns that counsel is not handling the case as well as they should. *See Rainey*, 527 P.3d at 394; *Lane*, 80 So. 3d at 299. But the extraordinary remedy of a writ "is not available where the matter is within the discretion of the trial court." *State ex rel. Woodford v. Marion Sup. Ct.*, 655 N.E.2d 63, 66 (Ind. 1995). This is such a case.

Allen has not asked this Court to mandate further proceedings but an outcome. Allen seeks a combination of relief—reinstatement of counsel, removal of the judge, and trial within 70 days of the writ—that would not permit Respondent, or any successor judge, to undertake further proceedings prior to trial. This is inappropriate to decide whether the trial court abused its discretion. Writs may

issue to compel lower courts to act on matters within their discretion, but they are not appropriate to dictate how that discretion is exercised. *State ex rel. Beatty*, 120 N.E.2d at 408. The balance between a defendant's ability to choose representation and his right to effective representation warrants comprehensive appellate review, not the expedited and truncated proceedings here.

II.
The request that the Court order trial to commence within 70 days is improper as Allen has not requested this relief in the trial court.

As his second request for relief, Allen asks the Court to order his trial to commence within 70 days of the issuance of the writ. Pet. at 14. Allen has not moved for an early trial under Indiana Criminal Rule 4. Allen points to the fact that he signed a motion in August 2023 requesting an early trial that has purposefully not been filed with the trial court. Pet. at 17.[3] A trial court cannot act on a motion that has never been presented to it. "'Until the trial court has shown by some ruling or refusal to act that it is exceeding or failing to exercise its jurisdiction, there is no basis for action'" by the Court. *State ex rel. Wonderly v. Allen Cir. Ct.*, 412 N.E.2d 1209, 1211 (Ind. 1980) (quoting *State ex rel. City of Indianapolis v. Marion Cty Sup. Ct.*, 216 N.E.2d 349, 350 (Ind. 1966). Allen can file a motion for early trial at any time, and the trial court must set the trial date within 70 days. Crim. R. 4(B). Because Allen has not yet requested an early trial, it is improper for him to ask this Court to order that relief in the first instance.

[3] These assertions are based on evidence outside the record of proceedings. *See* footnote 1 above.

III.
The request that this Court replace Judge Gull is improper as that request has not been properly presented to the trial court.

As his third request for relief sought, Allen asks the Court to remove Judge Gull and appoint a new special judge. This request is improper as Allen has not asked for this relief from the trial court. It is true that after he withdrew, Rozzi filed a Motion to Disqualify (R. Vol I at 238). However, at the time that Rozzi filed the motion, he was no longer Allen's attorney, so Judge Gull did not take any action on the motion (R1 at 34). Allen cites no authority that a trial court must entertain a motion by an attorney who is not the party's current attorney. *Accord Professional Laminate & Millwork, Inc. v. B & R Enters.*, 651 N.E.2d 1153 (Ind. Ct. App. 1995) (filings by attorney not properly granted pro hac vice a nullity). Allen does not meet the condition precedent of Rule 2(A). Because Allen did not first request this relief in writing from the trial court, it is improper to request this relief now.

Further, Allen fails to show that a remedy by appeal is not adequate. Current counsel could have filed Rozzi's motion or sought interlocutory appeal on the refusal.[4] "The appellate process is adequate to correct any abuse of the respondent court's discretion in denying relator's motion for change of judge." *State ex rel. Robinson v. Grant Sup. Ct. No. 1*, 471 N.E.2d 302, 303 (Ind. 1984). A writ is inappropriate because Allen has a remedy through the appellate process; he can file his motion for change of judge, and if denied, he can appeal that decision.

[4] Current counsel can file a change of judge at any time if they share Baldwin and Rozzi's concerns about Judge Gull's ability to be impartial.

Finally, Allen only points to the judge's rulings in this case to argue the judge is biased. This is not sufficient. "The mere assertion that certain adverse rulings by a judge constitute bias and prejudice does not establish the requisite showing of personal bias or prejudice." *Voss v. State*, 856 N.E.2d 1211, 1217 (Ind. 2006). Even if properly before the Court, this record does not support a change of judge.

CONCLUSION

Because the precise relief requested by Allen is not appropriate for resolution in this original action, this Court should deny the writ.

Respectfully submitted,

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CERTIFICATE OF WORD COUNT

I verify that this brief contains no more than 4,200 words.

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CERTIFICATE OF SERVICE

I certify that on November 27, 2023, I electronically filed the foregoing using the Indiana Electronic Filing System (IEFS), and that on the same date the foregoing document was served upon counsel via IEFS.

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