Summary of SC98847, *State of Missouri v. Tyler Gates*
Appeal from the Jackson County circuit court, Judge Jack R. Grate
Argued and submitted September 1, 2021; opinion issued December 21, 2021

Attorneys: Gates was represented by Jeannie Willibey and Rosemary E. Percival of the public defender's office in Kansas City, (816) 889-7699. The state was represented by Gregory L. Barnes of the attorney general's office in Jefferson City, (573) 751-3321.

This summary is not part of the opinion of the Court. It is provided by communications counsel for the convenience of the reader. It neither has been reviewed nor approved by the Supreme Court and should not be quoted or cited.

Overview: A defendant appeals his judgment of conviction for second-degree felony murder and armed criminal action, arguing the circuit court violated his constitutional right to present a complete defense when it prohibited him from presenting evidence he acted in self-defense. In a unanimous decision written by Judge Mary R. Russell, the Supreme Court of Missouri reverses the circuit court's judgment and remands (sends back) the case. The circuit court's evidentiary rulings excluding evidence of the defendant's version of the events – that he acted in self-defense – prevented the defendant from presenting a complete defense and, therefore, violated his constitutional rights.

Facts: Tyler Gates drove Luis Ramirez to pick up Matthew Haylock to go to an Independence mall. Once they arrived, a conflict arose during which Haylock was shot and killed. Ramirez told police, and later testified, that, while driving, Gates had asked to see Haylock's gun. Gates then refused to return it to Haylock. When Haylock reached for his gun, a struggle ensued and Haylock was shot. Gates claimed, however, that Haylock attempted to rob him by pointing a gun in Gates' face and demanding money. The state charged Gates with second-degree felony murder and armed criminal action. Prior to trial, the state filed a motion to prohibit Gates from injecting the issue of self-defense at trial pursuant to section 563.031.1(3), RSMo, asserting the murder occurred during the course of a forcible felony – Gates' robbery of Haylock. Gates opposed the motion, asserting prohibiting such evidence would result in predetermination of an issue in dispute – whether he robbed Haylock. The circuit court sustained the state's motion. Gates testified at trial but was prohibited from testifying he acted in self-defense. He was found guilty as charged and was sentenced to a total of 20 years in prison. Gates appeals.

REVERSED AND REMANDED.

Court en banc holds: (1) The circuit court's evidentiary rulings prohibiting Gates from presenting any evidence related to self-defense infringed on his Sixth and Fourteenth amendment rights to present a complete defense. An accused's right to present his or her own version of events in his or her own words is fundamental to the fairness of a criminal proceeding; therefore, evidentiary rules permitting the accused to testify but arbitrarily excluding material portions of his or her testimony cannot be applied. The circuit court repeatedly denied Gates the opportunity to present his full account of the events in question, which prevented him from meaningfully contesting whether he actually committed the robbery that was the basis for the felony murder charge. As a result, the circuit court violated his constitutional rights.

(2) The circuit court misinterpreted section 563.031.1(3), RSMo, by ruling the statute prohibited Gates from testifying about self-defense. The statute does not prohibit the admissibility of evidence; instead, it addresses the availability of a legal defense. It does not prevent a criminal defendant from arguing he or she used physical force for a purpose other than committing the forcible felony for which the defendant is charged. Such a rule would be a clear violation of the defendant's constitutional rights, as a criminal defendant is entitled to a jury determination that he or she is guilty beyond a reasonable doubt of every element of the crime with which he or she is charged.