

STATE OF LOUISIANA

COURT OF APPEAL, FIRST CIRCUIT

STATE OF LOUISIANA

NO. 2026 KW 0849

VERSUS

JOSHUA A. LEBEUF

SEPTEMBER 18, 2026

In Re: Joshua A. Lebeuf, applying for supervisory writs, 20th Judicial District Court, Parish of East Feliciana, Nos. 2025-CR-642, 643, 644, 645, 646.

BEFORE: PENZATO, LANIER, AND FIELDS, JJ.

WRIT GRANTED IN PART AND DENIED IN PART. An accused's "technical legal knowledge, as such, [is] not relevant to an assessment of his knowing exercise of the right to defend himself." See **Faretta v. California**, 422 U.S. 806, 836, 95 S.Ct. 2525, 2541, 45 L.Ed.2d 562 (1975). A trial judge confronted with an accused's unequivocal request to represent himself need determine only whether the accused is competent to waive counsel and is voluntarily exercising his informed free will. **State v. Santos**, 99-1897 (La. 9/15/00), 770 So.2d 319, 321 (*per curiam*). In this context, "the competence that is required of a defendant seeking to waive his right to counsel is the competence to waive the right, not the competence to represent himself." **Godinez v. Moran**, 509 U.S. 389, 399, 113 S.Ct. 2680, 2687, 125 L.Ed.2d 321 (1993). In assessing whether relator was making a knowing and intelligent request to represent himself, the record reflects that the district court asked relator if he has some "significant legal training." The record does not affirmatively show that the district court inquired into relator's competence to waive counsel. Accordingly, the writ application is granted for the sole purpose of remanding for a reopened hearing on relator's motion for self-representation to be conducted in accordance with **Faretta**. In all other respects, the writ application is denied.

AHP
WIL
WEF

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