

*This opinion is nonprecedential except as provided by
Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A25-0236**

State of Minnesota,
Respondent,

vs.

Quenton Tyrone Williams,
Appellant.

**Filed September 21, 2026
Affirmed
Frisch, Chief Judge**

Hennepin County District Court
File No. 27-CR-22-24533

Keith Ellison, Attorney General, St. Paul, Minnesota; and

Mary F. Moriarty, Hennepin County Attorney, Britta Nicholson, Assistant County Attorney, Minneapolis, Minnesota (for respondent)

Cathryn Middlebrook, Chief Appellate Public Defender, Laura G. Heinrich, Assistant Public Defender, St. Paul, Minnesota (for appellant)

Considered and decided by Wheelock, Presiding Judge; Frisch, Chief Judge; and Reilly, Judge.*

* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to Minn. Const. art. VI, § 10.

NONPRECEDENTIAL OPINION

FRISCH, Chief Judge

Appellant challenges the district court's entry of judgment of conviction of fourth-degree assault and related denial of his petition for postconviction relief, arguing that his right to a speedy trial was violated. Because we conclude that appellant was not deprived of his constitutional right to a speedy trial, we affirm.

FACTS

In December 2022, respondent State of Minnesota charged appellant Quenton Tyrone Williams with fourth-degree assault, in violation of Minn. Stat. § 609.2231, subd. 1(c)(2) (2022), following an incident where Williams spit on a law-enforcement officer in Hennepin County. During the pendency of the proceedings on the Hennepin County charge—the subject of this appeal—Williams appeared in multiple proceedings in several additional counties, which we summarize in pertinent part.

At Williams's first appearance on the Hennepin County charge, the district court scheduled a January 5, 2023 omnibus hearing and conditionally released Williams without bail. Williams failed to appear at the January 5 omnibus hearing, and the district court issued an arrest warrant. Williams appeared in Hennepin County on the warrant on January 20, and the district court scheduled a March 10 omnibus hearing and again conditionally released Williams without bail.

In early March, Williams was charged with a new offense in Dakota County, and the district court ordered an in-custody Rule 20 competency evaluation at Williams's counsel's request. *See* Minn. R. Crim. P. 20.01; Minn. Stat. § 611.42 (2022). Although

Williams refused to participate in the competency-evaluation process, the district court ultimately found him competent on May 26, 2023. During this competency-evaluation process, Williams failed to appear at the March 10 omnibus hearing in the Hennepin County matter, and the district court issued a second warrant.

In May 2023, Williams sent a letter to the district court in the Hennepin County matter requesting, in pertinent part, a “speedy trial in the cases,” to discharge his counsel and represent himself, and to be transported to Hennepin County or to appear in court remotely.

On June 7, Williams appeared in Hennepin County. At that time, he had been released from custody in the Dakota County matter but had several matters pending in Anoka County and Ramsey County. In the Hennepin County matter, Williams requested through counsel to be conditionally released without bail, which the district court denied, and sought to discharge his counsel and represent himself, which the district court took under advisement. Williams did not renew the speedy-trial request from his May 2023 letter. The district court scheduled a June 22 omnibus hearing.

On June 22, Williams appeared for the omnibus hearing in Hennepin County. His counsel noted that he had been transported from another county and was still subject to active warrants elsewhere. Williams declined a plea offer and requested through counsel to be released without bail, noting that “he has concerns about the longer he stays in custody, the more likely he is to lose his permanent housing.” Over the state’s objection, the district court conditionally released Williams without bail. The district court scheduled

the matter for trial on October 16, 2023. Neither Williams nor his counsel raised speedy-trial concerns.

Sometime in late September or early October 2023, Williams was taken into custody in Ramsey County on a new charge. While in custody in Ramsey County, Williams failed to appear for his October 16 trial in Hennepin County, and a third warrant issued. Williams did not appear in Hennepin County again until March 2024. The record reflects that trial was scheduled for May 6, 2024, but was continued to May 13 due to defense counsel's unavailability.

Meanwhile, Williams was engaged in competency proceedings in both Dakota County and Ramsey County, extending into early 2024.

The record indicates that between March and May, Williams failed to participate in the competency evaluations in Dakota County and Ramsey County. On May 8, 2024, Williams was ordered into custody in Ramsey County to complete a competency evaluation after "exhaustive" attempts to conduct the evaluation out of custody failed. At that time, Williams told the district court that "all along everyone has known that I wasn't going to do a Rule 20." The district court in the Ramsey County proceedings ultimately found Williams competent on June 12, 2024, and the district court in the Dakota County proceedings found Williams competent for the second time on August 8, 2024.

Williams failed to appear for the May 13 Hennepin County trial, and a fourth warrant issued.

On June 14, 2024, Williams appeared in Hennepin County. Williams requested through counsel to be released without bail, arguing that "everyone was aware" that he was

in Ramsey County undergoing competency proceedings when he failed to appear for the May 13 trial in the Hennepin County matter. The district court denied Williams's request to be released without bail, noting that there had been four failure-to-appear warrants issued during the pendency of the matter.

On June 26, 2024, Williams appeared in custody for an omnibus hearing in the Hennepin County matter. Williams requested through counsel to be released from custody without bail, again noting that he had failed to appear at the May trial date because he had been in custody in Ramsey County. Williams's counsel also argued that even if Williams had been able to appear remotely for the May 13 trial date, trial could not have proceeded because "competency was at question" at that point. The district court denied Williams's request for release without bail, but modified bail to \$20,000 without conditions and \$1,000 (with a \$100 cash alternative) with conditions. Williams's counsel entered a formal speedy-trial demand. Trial was scheduled for August 19, 2024—54 days from Williams's speedy-trial demand. The next day, Williams posted the \$100 cash bail and was released from custody.

Williams appeared for his Hennepin County trial on August 19. The state was unavailable to proceed that day because the prosecutor was already assigned to a different trial, so the case was placed on standby until August 21. On August 21, because the state remained unavailable for trial, the district court continued the trial date to October 21, 2024—approximately 117 days after Williams's counsel demanded a speedy trial.

On August 27, 2024, Williams appeared in Hennepin County on a new felony charge and a corresponding violation of his conditions of release on the Hennepin County

fourth-degree assault charge. The district court set unconditional bail at \$30,000 on the new felony charge and \$20,000 on the fourth-degree assault charge.

On October 21, 2024, Williams appeared for trial on the Hennepin County fourth-degree assault charge. At the start of trial, Williams moved through counsel to dismiss the charge based on an alleged violation of his speedy-trial rights. Counsel argued that the state was responsible for the delay in bringing the case to trial because it was unavailable to try Williams's case as scheduled on August 19, and Williams experienced prejudice associated with his custodial status on the new charge. In reply, the state argued that Williams's own actions resulted in his custodial status because he violated the conditions of release as a result of the new felony charge. The district court denied Williams's motion to dismiss, stating:

Well, I do note that the defendant made a demand for a speedy trial. That today's date is outside the speedy trial period. I find no prejudice to the defendant in that the defendant is in custody because he violated conditions of release and because he was charged with a new felony matter. No other prejudice has been identified by the defense to the defendant other than the inconvenience of having the matter set for trial and the fact that he's now in custody because he's alleged to have committed a new crime.

Williams himself then made several motions, including a motion to dismiss due to ineffective assistance of counsel, a motion for new counsel or substitute counsel based on ineffective assistance of counsel, a motion to proceed pro se, and a motion for a conflict attorney. The district court informed Williams that new counsel, if appointed, would very likely request a continuance of the trial date and Williams would remain in custody during

that time. Williams replied that he “understood.” The district court continued the trial until later in the afternoon so Williams could determine whether to proceed with counsel.

When trial resumed in the afternoon, the parties informed the district court that Williams had instead agreed to a stipulated-evidence trial. Williams waived his right to a jury trial and submitted exhibits to the district court. The district court conditionally released Williams without bail and scheduled a hearing on November 15, 2024.

On November 14, 2024, the district court filed a written order finding Williams guilty of fourth-degree assault. The following day, the district court sentenced Williams to time served and discharged him from probation.

On February 12, 2025, Williams filed a notice of appeal. Williams subsequently filed a motion in this court seeking to stay the appeal to allow him time to pursue postconviction relief in the district court, which we granted. *State v. Williams*, No. A25-0236 (Minn. App. July 16, 2025) (order).

Williams then filed a petition in the district court, which was later amended, seeking relief from his conviction based on a violation of his right to a speedy trial and ineffective assistance of counsel. Williams argued that his right to a speedy trial was violated when the proceedings in Hennepin County were “put on hold to see what happened in the contested competency proceedings” in Ramsey County, and those competency proceedings “did not follow the process laid out in Minn. R. Crim. Pro. 20.01, putting his cases on hold for a year without any incompetency finding.” He also argued that he received ineffective assistance of counsel when his trial attorney did not move to dismiss his case in Hennepin

County for a speedy-trial violation based on the alleged procedural errors in the Ramsey County competency proceedings.

After briefing was submitted on Williams’s postconviction petition, we filed a nonprecedential decision in a separate appeal from Williams’s convictions in Ramsey County involving the contested competency proceedings. *State v. Williams*, No. A25-0097, 2026 WL 81747 (Minn. App. Jan. 12, 2026), *rev. denied* (Minn. Mar. 25, 2026). We affirmed Williams’s convictions, concluding, in pertinent part, that Williams was not denied his constitutional right to a speedy trial and that “Williams has not demonstrated that the district court committed any errors in its management of the competency proceedings.” *Id.* at *5-6.

On February 21, 2026, the postconviction court denied Williams’s petition without an evidentiary hearing, concluding that the allegations set forth in the petition did not legally entitle Williams to the requested relief for two reasons. First, the postconviction court concluded that Williams’s claims “fail on their face” because they are based on Williams’s assertion that the competency proceedings in Ramsey County were procedurally defective, but we concluded in Williams’s appeal from that matter that Williams had not demonstrated any error in the district court’s management of the competency proceedings. *Id.* at *6. Second, the postconviction court concluded that Williams was not entitled to relief because his speedy-trial rights were not violated. And because there was no speedy-trial violation, Williams’s ineffective-assistance-of-counsel claim based on his counsel’s failure to move for dismissal on speedy-trial grounds also failed. The postconviction court concluded that, on balance, Williams did not establish a

speedy-trial violation because the 22-month delay between Williams’s charging and trial date was mostly attributable to Williams, because Williams’s actions undermined the seriousness of his demand for a speedy trial, and because Williams did not establish any prejudice from the delay in bringing his case to trial.

After the postconviction court denied Williams’s petition, we granted Williams’s request to dissolve the stay of his direct appeal.

DECISION

Williams argues that his conviction must be reversed for a violation of his constitutional right to a speedy trial.

The United States and Minnesota Constitutions afford criminal defendants the right to a speedy trial. U.S. Const. amend. VI; Minn. Const. art. I, § 6. Under Minn. R. Crim. P. 11.09(b), a trial must start within 60 days of a speedy-trial demand “unless the court finds good cause for a later trial date.” If a defendant has been deprived of their constitutional right to a speedy trial, the criminal case against them must be dismissed. *State v. Osorio*, 891 N.W.2d 620, 627 (Minn. 2017). “When a defendant initially files a direct appeal and then moves for a stay to pursue postconviction relief, we review the postconviction court’s decisions using the same standard that we apply on direct appeal.” *State v. Beecroft*, 813 N.W.2d 814, 836 (Minn. 2012). We review a claimed speedy-trial violation de novo. *State v. Taylor*, 869 N.W.2d 1, 19 (Minn. 2015).

We apply a four-factor test to determine whether a defendant’s right to a speedy trial was violated. *State v. Windish*, 590 N.W.2d 311, 315 (Minn. 1999) (applying test established in *Barker v. Wingo*, 407 U.S. 514 (1972)). These four *Barker* factors are:

“(1) the length of the delay; (2) the reason for the delay; (3) whether the defendant asserted his or her right to a speedy trial; and (4) whether the delay prejudiced the defendant.” *Id.* “None of these factors is either a necessary or sufficient condition to the finding of a deprivation of the right of speedy trial. Rather, they are related factors and must be considered together with such other circumstances as may be relevant.” *Taylor*, 869 N.W.2d at 19 (quotation omitted). “In other words, we must engage in a difficult and sensitive balancing process.” *Id.* (quotation omitted). We address each factor in turn.

Length of Delay

The first *Barker* factor—the length of the delay—is the “triggering mechanism” that determines whether we must conduct further review. *Windish*, 590 N.W.2d at 315 (quotation omitted); *see also Taylor*, 869 N.W.2d at 19 (“A delay that exceeds 60 days from the date of the demand raises a presumption that a violation has occurred, and we must apply the remaining factors of the test.”); *State v. Mikell*, 960 N.W.2d 230, 246 (Minn. 2021) (concluding that a six-month delay between the beginning of prosecution and trial was presumptively prejudicial). The parties do not dispute that the first *Barker* factor weighs in favor of Williams because the trial did not begin until approximately 22 months after Williams’s charging and over 60 days after his speedy-trial demand.

Reason for Delay

In assessing the second *Barker* factor—the reason for the delay—“the key question is whether the government or the criminal defendant is more to blame for th[e] delay.” *Taylor*, 869 N.W.2d at 19 (quotation omitted). After determining which party is responsible for the delay, we consider the specific reason for the delay. *Osorio*, 891

N.W.2d at 628 (citing *Barker*, 407 U.S. at 531). “We weigh various reasons differently.” *Id.* For example, “a deliberate delay to hamper the defense weighs heavily against the prosecution, while neutral reasons such as negligence or overcrowded courts weigh less heavily.” *Taylor*, 869 N.W.2d at 20 (quotations omitted). “When the overall delay in bringing a case to trial is the result of the defendant’s actions, there is no speedy trial violation.” *Id.* (quotation omitted). “Delays caused by defense counsel, whether appointed or privately retained, are attributable to the defendant.” *State v. Jones*, 977 N.W.2d 177, 191 (Minn. 2022); *see also Vermont v. Brillon*, 556 U.S. 81, 90-91 (2009) (“Because the attorney is the defendant’s agent when acting, or failing to act, in furtherance of the litigation, delay caused by the defendant’s counsel is charged against the defendant.” (quotation omitted)).

The 22-month delay from Williams’s charging to trial is attributable to both the defense and to the state, but the overall delay in bringing the case to trial is predominantly the result of Williams’s actions.

Any delay in bringing the case to trial between the initial filing of the charge against Williams on December 8, 2022, and June 2024, is attributable to Williams. During this time, Williams was subject to multiple competency proceedings in other counties—mostly initiated through his own counsel, and the prolonged nature of which resulted from his refusal to cooperate in such proceedings. In addition, Williams failed to appear four times in district court in Hennepin County. Therefore, the delays in bringing Williams’s case to trial in Hennepin County between December 8, 2022, and June 2024 are directly attributable to Williams’s own actions and thus to Williams himself.

To persuade us otherwise, Williams appears to argue that the entire 22-month delay is attributable to the state because either (1) the criminal proceedings in Hennepin County were improperly suspended to await the results of contested competency proceedings in other jurisdictions, or (2) the state should have issued a writ to bring Williams to trial in Hennepin County when it knew he was in custody in other counties. Neither argument is persuasive.

First, Williams's assertion that the criminal proceedings in Hennepin County were "stalled to wait the outcome" of competency determinations in other jurisdictions is not supported by the record. As the state notes, the postconviction court expressly rejected Williams's argument that the proceedings in Hennepin County had been suspended to await competency determinations in other counties. The postconviction court found that "[a]t every hearing, the Hennepin County courts proceeded with expediency, always issuing either a trial date, a hearing date, or a warrant." Williams does not challenge this factual finding on appeal; indeed, he states that it is "unclear" whether competency was ever at issue in the Hennepin County proceedings and asserts that the delay is attributable to the state "*if* Hennepin was awaiting competency findings before moving forward."

Second, Williams's argument that the state is responsible for the delay because it did not seek to bring Williams to Hennepin County through a writ when he was in custody in other counties is forfeited on appeal. "It is an elementary principle of appellate procedure that a party may not raise an issue or argument for the first time on appeal and thereby seek appellate relief on an issue that was not litigated in the district court." *Doe 175 by Doe 175 v. Columbia Heights Sch. Dist.*, 842 N.W.2d 38, 42 (Minn. App. 2014).

The state correctly asserts that Williams “never raised concern regarding a writ or transport order” during the pretrial proceedings, including in Williams’s motion to dismiss the charge on speedy-trial grounds. And Williams did not directly argue in his postconviction petition that the state was obligated to bring him to Hennepin County through a writ and that the failure to do so makes any delay in his case proceeding to trial attributable to the state. Because Williams did not argue to the district court that the state is responsible for the delay in bringing his case to trial because it was obligated to secure his court appearances through a writ, this argument is forfeited on appeal. *See Thiele v. Stich*, 425 N.W.2d 580, 582 (Minn. 1988) (stating that appellate courts “must generally consider only those issues that the record shows were presented and considered by the trial court in deciding the matter before it” and that an appellant may not “obtain review by raising the same general issue litigated below but under a different theory”).

We also observe that this argument is inadequately briefed. On appeal, Williams does not identify any applicable authority or provide legal analysis to support his assertion that the state is responsible for the delay in bringing his case to trial because it “did nothing to bring [Williams] to trial when they knew where he was.”¹ *See Schoepke v. Alexander Smith & Sons Carpet Co.*, 187 N.W.2d 133, 135 (Minn. 1971) (stating that assertion of

¹ The only case Williams cites is *State v. Colbert*, a nonprecedential decision from this court. No. A10-0055, 2011 WL 67785 (Minn. App. Jan. 11, 2011). This nonprecedential opinion does not stand for the proposition that the district court is obligated to secure Williams’s presence through the issuance of a writ and instead concludes that, given the circumstances of the case, we did not agree with the state that “appellant’s confinement in Ramsey County, only a few miles from the location of his trial in Hennepin County, is good cause for the delay.” *Id.* at *3.

error unsupported by legal argument or authority is forfeited unless prejudicial error is obvious on mere inspection); *see also State, Dep't of Labor & Indus. v. Wintz Parcel Drivers, Inc.*, 558 N.W.2d 480, 480 (Minn. 1997) (declining to address inadequately briefed issue). Here, we discern no prejudicial error upon mere inspection.

We conclude that the continuance of trial from August 19 to October 21, 2024, is a delay attributable to the state, but this delay does not weigh heavily against the state. *See Taylor*, 869 N.W.2d at 20 (stating that “neutral reasons” for a delay like “overcrowded courts” do not weigh heavily against the state); *see also State v. Friberg*, 435 N.W.2d 509, 513 (Minn. 1989) (noting that docket congestion is not a good cause for delay, but it also does not weigh heavily against the state); *State v. Hahn*, 799 N.W.2d 25, 32 (Minn. App. 2011) (stating that “administrative delay, by itself, is generally insufficient to violate a defendant’s speedy-trial right in the absence of a deliberate attempt to delay trial”), *rev. denied* (Minn. Aug. 24, 2011). Williams formally demanded a speedy trial on June 26, 2024, and his case was set for trial on August 19, 2024—within the 60-day speedy-trial window. The case was continued to October 21, 2024—outside the 60-day speedy-trial window—because of the state’s unavailability to proceed given that the prosecutor was already assigned to another trial. But Williams does not argue—and the record does not reflect—that the continuance of trial to October 2024 was the result of a deliberate attempt by the state to hamper Williams’s defense. We thus conclude that, while the delay from August 2024 to October 2024 is attributable to the state, such delay does not weigh heavily against the state.

On balance, the overall 22-month delay from Williams’s charging to trial is primarily a result of Williams’s actions. Much of the delay is attributable to Williams’s in-custody status in other counties, his counsel’s requests for and during the contested competency proceedings, his refusal to participate in competency evaluations, his incurring new charges, and his failures to appear at scheduled hearings. The only delay attributable to the state is the continuance of trial from August 2024 to October 2024 due to the state’s unavailability. But this delay does not weigh heavily against the state because there is no suggestion that the state’s unavailability was a deliberate attempt by the state to hamper Williams’s defense. We thus conclude the second *Barker* factor weighs against Williams. *See Taylor*, 869 N.W.2d at 20 (“When the overall delay in bringing a case to trial is the result of the defendant’s actions, there is no speedy trial violation.” (quotation omitted)).

Assertion of the Right

As to the third *Barker* factor—whether Williams asserted his right to a speedy trial—the parties do not dispute that Williams twice invoked his right to a speedy trial during pretrial proceedings. However, the state argues that Williams’s conduct after demanding a speedy trial undermines the seriousness of his demand. We agree.

We consider the “frequency and force” of a defendant’s speedy-trial demand because “the strength of the demand is likely to reflect the seriousness and extent of the prejudice which has resulted.” *Friberg*, 435 N.W.2d at 515; *see also Mikell*, 960 N.W.2d at 252 (explaining that the defendant’s assertion of speedy-trial right is entitled to strong evidentiary weight when it evidences the defendant’s belief that he will be harmed if the trial is delayed); *State v. Johnson*, 498 N.W.2d 10, 16 (Minn. 1993) (stating that whether

speedy-trial assertions are “prompt” and “forceful” are both “key to a court’s evaluation of a speedy trial claim”). We can “consider other signals in the case to assess whether a demand for a speedy trial is serious, [and] such an assessment focuses on whether the speedy-trial demands are accompanied by actions that undermine the ability for the trial to occur.” *State v. Paige*, 977 N.W.2d 829, 841 (Minn. 2022) (quotation omitted).

While Williams asserted his right to a speedy trial in his May 2023 letter to the district court and his formal speedy-trial demand through counsel in June 2024, his conduct throughout the proceedings lessens the weight we afford to his assertion of the right. Williams first requested a speedy trial via a letter sent to the district court in May 2023—approximately five months after his arrest. The parties do not dispute that this letter request did not start the 60-day speedy-trial window because, among other reasons, Williams had not yet entered a plea of not guilty in the Hennepin County matter. *See* Minn. R. Crim. P. 11.09(b) (requiring a trial to commence within 60 days “[o]n demand of any party after entry of [a plea other than guilty]”). But we consider Williams’s May 2023 request in assessing whether Williams frequently, forcefully, and promptly invoked his speedy-trial right. *Cf. Windish*, 590 N.W.2d at 796 (stating that, in the context of assessing the third *Barker* factor, “[a]ssertion of the right to a speedy trial need not be formal or technical”). Williams did not mention this request again until June 2024, despite appearing before the district court for several hearings and arguing various issues directly to the court. On appeal, Williams asserts that he “asked for a trial in June 2023 in court after entering a not guilty plea,” but the record instead reflects that the district court raised scheduling trial at the June 22, 2023 hearing; when trial was scheduled for October 2023, Williams did not

object or otherwise raise speedy-trial concerns. Williams did not raise the speedy-trial issue again until June 26, 2024—approximately 18 months after his arrest and 12 months after he entered a plea of not guilty.

And although Williams moved for dismissal on speedy-trial grounds on the first day of trial, the supreme court has reasoned that moving to dismiss a charge on speedy-trial grounds can “suggest[] more of a desire to avoid trial altogether rather than a serious interest in proceeding to trial promptly.” *Mikell*, 960 N.W.2d at 253. That is true here, particularly as Williams moved to dismiss the case on the very day trial was scheduled to begin. *See id.* at 253 n.15 (explaining that the distinction between a motion to dismiss on speedy-trial grounds and a speedy-trial demand is “particularly relevant” where trial was “scheduled and imminent” when the defendant moved to dismiss the case).

Further, after the district court denied his motion to dismiss, Williams made additional motions to further delay trial, including motions for substitute counsel, appointment of a conflicts attorney, or potential discharge of his counsel. Williams told the district court that he “understood” that the relief he sought would likely lead to a continuance of the trial date. Williams’s own actions therefore undercut the seriousness of his demand for a speedy trial. *Cf. Johnson*, 498 N.W.2d at 16 (weighing the third factor against defendant, noting that “his other speedy trial demands were followed by additional defense motions delaying the trial”).

Given these circumstances, Williams’s speedy-trial requests were not frequent, prompt, or forceful. *Cf. id.* (describing the fact that defendant asserted his speedy-trial right four times in nearly two years as “significant” to assessing the third factor and

concluding that “although perhaps frequent, the defendant’s speedy trial assertions here cannot be regarded as prompt or forceful” because the first assertion of the right took seven months and was made after attempts to have the indictment dismissed, and other speedy-trial demands were followed by additional defense motions delaying the trial). We conclude this factor does not favor Williams.

Prejudice

As to the fourth *Barker* factor, the supreme court has identified “three interests to consider in determining whether a defendant suffered prejudice: (1) preventing oppressive pretrial incarceration; (2) minimizing the anxiety and concern of the accused; and (3) preventing the possibility that the defense will be impaired.” *Taylor*, 869 N.W.2d at 20 (quotation omitted). The supreme court has noted that “the third interest, preventing impairment of a defendant’s defense, is the most serious.” *Id.* (quotation omitted).

In light of these considerations, we discern no prejudice associated with the delay in bringing Williams to trial. On appeal, Williams does not identify any time that he was held in custody on the fourth-degree assault charge at issue in this appeal. Indeed, the record reflects that Williams’s time in custody in various counties stemmed from new criminal charges, repeated violations of conditional release, multiple outstanding warrants, and his refusal to participate in Rule 20 competency evaluations. When a defendant “is already in custody for another offense . . . the first two interests are not implicated.” *Id.* And Williams does not argue that the delay in commencing his trial impaired his defense to the Hennepin County charge. Because Williams was in custody for other, unrelated

offenses and does not suggest any harm to his case caused by the delay, we discern no prejudice associated with the delay in the case proceeding to trial.²

On balance, we do not discern a violation of Williams's right to a speedy trial. The overall delay in the case proceeding to trial was primarily the result of Williams's actions; Williams's assertions of the speedy-trial right were not frequent, prompt, or forceful; and Williams identifies no cognizable prejudice caused by the delay in the case proceeding to trial. Under these circumstances, Williams's trial occurred "quickly enough so as not to endanger the values that the right to a speedy trial protects." *Paige*, 977 N.W.2d at 843. Thus, we conclude that Williams was not deprived of his constitutional right to a speedy trial.

Affirmed.

² We agree with Williams's assertion on appeal that he is "not required to prove specific prejudice," in the sense that "affirmative proof of particularized prejudice is not essential to every speedy trial claim." *Paige*, 977 N.W.2d at 841-42. But only the third interest is relevant here because Williams was held in custody on other, unrelated offenses, and Williams does not allege any tangible harm to his case caused by the delay in proceeding to trial. *Cf. id.* at 843 (stating that "[b]ecause impairment of defense can be difficult to prove, it may be suggested by likely harm to a defendant's case").