

*This opinion is nonprecedential except as provided by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
A25-0957**

State of Minnesota,
Respondent,

vs.

Quenton Tyrone Williams,
Appellant.

**Filed June 15, 2026
Affirmed
Ede, Judge**

Dakota County District Court
File No. 19HA-CR-23-470

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

Kathryn M. Keena, Dakota County Attorney, Joseph Williamson, Assistant County Attorney, Hastings, Minnesota (for respondent)

Cathryn Middlebrook, Chief Appellate Public Defender, Evan Ottaviani, Assistant Public Defender, St. Paul, Minnesota (for appellant)

Considered and decided by Bentley, Presiding Judge; Ede, Judge; and Beane, Judge.

NONPRECEDENTIAL OPINION

EDE, Judge

In this appeal from final judgments of conviction for threats of violence and fourth-degree assault, appellant argues for reversal based on a claimed violation of his rights to a speedy trial. Appellant asserts the same speedy-trial claim in a self-represented supplemental brief. Additionally, he contends that his waiver of trial counsel was not

knowing, intelligent, and voluntary, and that the dismissal of two counts of fifth-degree assault deprived him of the opportunity to present a self-defense theory relating to the remaining counts. We affirm.

FACTS

On March 7, 2023, respondent State of Minnesota charged appellant Quenton Tyrone Williams with four counts: threats of violence, in violation of Minnesota Statutes section 609.713, subdivision 1 (2022) (Count I); fourth-degree assault, in violation of Minnesota Statutes section 609.2231, subdivision 1(c)(2) (2022) (Count II); fifth-degree assault, in violation of Minnesota Statutes section 609.224, subdivision 1(1) (2022) (Count III); and fifth-degree assault, in violation of Minnesota Statutes section 609.224, subdivision 1(2) (2022) (Count IV).¹ According to the complaint, Williams assaulted a patron in a store, threatened violence against police officers, and assaulted law enforcement. Williams eventually waived his right to a jury trial and agreed with the state to submit the matter to the district court on stipulated evidence under Minnesota Rule of Criminal Procedure 26.01, subdivision 3. As relevant to the issues on appeal, the following factual summary stems from the record of the underlying proceedings.²

¹ Unless otherwise noted, all proceedings discussed in this factual summary occurred in Dakota County District Court.

² We granted Williams's motion to file a confidential brief for our use and a redacted brief that is publicly accessible. Many documents in the record on appeal, such as the Minnesota Rule of Criminal Procedure 20.01 forensic evaluation reports, are designated confidential. Although "materials filed as confidential in the district court remain nonpublic on appeal[,] . . . we are not precluded from mentioning the contents of confidential or sealed documents when the information is relevant to the particular issues or legal argument being addressed in the proceeding." *Life Time, Inc. v. Zurich Am. Ins. Co.*, 25 N.W.3d 901, 904

At Williams’s first appearance on March 7, the district court orally granted defense counsel’s request for a competency evaluation under Minnesota Rule of Criminal Procedure 20.01. The district court also continued the case until May 16. On March 10, the district court filed a written order directing the completion of a rule 20.01 forensic evaluation report and suspending the proceedings pending receipt of that report.

A rule 20.01 report was filed on April 25. The state objected to the April 25 rule 20.01 report, noting the examiner’s opinion that Williams was incompetent to stand trial, objecting to a finding of incompetency to proceed based on the report, and requesting a hearing under rule 20.01, subdivision 3. On May 18, the district court filed an order directing the examiner to “update his current rule 20.01 evaluation with a supplemental report with any and all new information he has obtained.”

In an updated rule 20.01 report filed on May 25, the examiner opined that Williams was competent to proceed. At a hearing the next day, the district court asked Williams’s counsel about adopting the recommendations of the updated rule 20.01 report. Williams’s counsel responded by stating that, if the district court were to find Williams competent to proceed “through [the examiner’s] second note,” the defense would not object. Without asking the state to present evidence or argument, the district court found that Williams was competent to proceed and adopted the recommendations of the updated rule 20.01 report.

n.1 (Minn. App. 2025) (quotations and citation omitted), *rev. denied* (Minn. Oct. 29, 2025); *see also* Minn. R. Civ. App. P. 112.02, subd. 1. “Nor are we constrained from disclosing information contained in the publicly filed briefs.” *Life Time*, 25 N.W.3d at 904 n.1 (citing Minn. R. Pub. Access to Recs. of Jud. Branch 4) (other citation omitted). We limit our discussion in this opinion to information—including material that appears in publicly filed documents—that is relevant to the particular issues and legal arguments addressed herein.

The district court resumed the proceedings and continued the matter for an omnibus hearing set for June 1.

Williams entered a speedy-trial demand at the June 1 omnibus hearing. The district court set a jury trial for July 24—a date within 60 days of Williams’s speedy-trial demand. But during proceedings on July 24, without objection from Williams, the district court found good cause to continue the matter to August 14. This was because Williams had several criminal cases pending in Ramsey County and, on June 26, his attorney in those matters had objected to the results of a rule 20.01 report. As of July 24, the Ramsey County rule 20.01 proceedings had not concluded. On August 14, the district court again continued the jury trial because the Ramsey County rule 20.01 proceedings remained unresolved. And at the August 14 hearing, Williams waived his rights to a speedy trial.

On October 24, Williams failed to appear for a scheduled omnibus hearing, and the district court issued a bench warrant for his arrest. About six weeks later, on December 5, Williams was arrested on the warrant. On the same day Williams was arrested, the district court held an in-custody bail hearing. At that hearing, the district court scheduled an omnibus hearing for December 28. During the December 28 omnibus hearing, Williams again demanded a speedy trial, and the district court scheduled a jury trial for February 12, 2024—a date within 60 days of Williams’s speedy-trial demand.

On February 12, Williams’s counsel referenced the prior rule 20.01 reports, noted that there was a pending competency hearing in Ramsey County, and requested another rule 20.01 evaluation. The state did not object, and the district court granted the request,

ordering that another rule 20.01 evaluation be completed. The district court set a hearing to review the results of the rule 20.01 evaluation for May 2.

On April 5, the rule 20.01 examiner filed correspondence stating that they had been unable to contact Williams, despite several calls and emails that the examiner made to Williams in February and March. Because Williams's whereabouts were unknown, the rule 20.01 evaluation was not completed by the May 2 review hearing. At that hearing, Williams was present with counsel, who requested that the district court reorder the rule 20.01 evaluation. The district court again ordered that the rule 20.01 evaluation be completed and continued the matter for a review hearing on July 11.

On June 25, the rule 20.01 examiner filed correspondence stating that they continued to be unable to contact Williams after making three additional attempts to reach him in May and June. On July 22, a rule 20.01 forensic evaluation report that had been completed in one of Williams's Ramsey County cases was filed in this case. In the Ramsey County rule 20.01 report, the examiner opined that Williams was competent to proceed. At a hearing on August 8, the district court found Williams competent based on the Ramsey County rule 20.01 report, resumed the proceedings, and scheduled a jury trial for September 16.

On September 16, Williams's counsel informed the district court that Williams wished to proceed to a jury trial and that he had entered a speedy-trial demand. After a recess, Williams told the district court that he would like to represent himself. The district court then engaged Williams in the following colloquy:

THE COURT: Okay. Are you asking to discharge your public defender?

WILLIAMS: Correct.

....

THE COURT: I'll ask you again, . . . you understand that the public defender is being discharged at this time?

WILLIAMS: Yes.

THE COURT: All right. And that's what you want to do?

WILLIAMS: Yes.

THE COURT: You want to move forward and represent yourself?

WILLIAMS: Correct.

The district court stated that it would appoint Williams advisory counsel and filed a written order to that effect. In addition, Williams informed the district court that he had prepared written motions that he wanted the court to consider: a motion to dismiss based on a claimed speedy-trial violation and a motion for dismissal under *Brady v. Maryland*, 373 U.S. 83 (1963). The district court filed Williams's self-represented motions, and the court continued the trial to September 19 so that it could consider a response from the state before ruling. In his speedy-trial motion, Williams argued that his former counsel had improperly requested a rule 20.01 evaluation, which "blocked his potential dismissal." The state filed a memorandum opposing Williams's speedy-trial motion.

On September 19, the district court reviewed with Williams a written "Petition to Proceed as Pro Se Counsel" and told him that it would reappoint counsel for him if he wished. The state informed the district court that it was dismissing Counts III and IV (the two fifth-degree assault charges), and that the state would be proceeding to trial only on

Counts I and II (threats of violence and fourth-degree assault). Among other inquiries regarding the petition, the district court asked Williams if he wanted the opportunity to speak with his former counsel about representing himself. Williams declined and stated that his former counsel was “against” him and was “untrustworthy.” Moreover, Williams affirmed that he had an opportunity to speak to his former counsel about the motions he filed. The district court heard arguments from the parties on both of Williams’s motions, orally denied them, and later filed a written order memorializing that ruling. In addition, the district court filed the written petition, which Williams had completed and signed during the proceedings. Because Williams requested advisory counsel but such counsel was unavailable at the time of the September 19 proceedings, the district court continued the matter for trial on October 7, which was within 60 days of Williams’s speedy-trial demand.

On October 2, Williams filed a motion entitled, “Plain Error Speedy Violation,” in which he claimed that a speedy-trial violation had occurred based on the demand he entered on December 5, 2023. Williams also filed an October 7, 2024 motion entitled, “The June 1, 2023, Speedy-Trial Demand Violation,” similarly contending a speedy-trial violation had occurred because trial had not commenced by July 31, 2023, after his June 1, 2023 demand.

On October 7, 2024, the parties informed the district court that they anticipated proceeding to a stipulated-evidence trial under Minnesota Rule of Criminal Procedure 26.01. The district court continued the matter to October 8 to address Williams’s October 2 and 7 motions, as well as the agreed-upon stipulated-evidence trial.

On October 8, Williams maintained that the district court's decision to set the jury trial on October 7 had also violated his speedy-trial rights because he had been found competent on August 8. After hearing arguments from the parties, the district court orally denied Williams's speedy-trial motions and later filed a written order consistent with that decision. Williams then requested a continuance of the matter until November or December so that he could review evidence and further prepare for trial. The district court denied Williams's continuance request. Williams thereafter waived his rights to a jury trial and confirmed that he wished to proceed via a stipulated-evidence trial. The district court recessed the matter until October 9 to allow the parties additional time to review and finalize their agreement about the stipulated evidence.

On October 9, Williams filed a "Motion to Preserve Record for Appeal," in which he argued that he had received ineffective assistance of counsel and asserted a self-defense claim. During the October 9 hearing, the district court received and filed "Defendant's Waiver & Stipulated Evidence Under Minn. R. Crim. P. 26.01, subd. 3," which the parties had signed. Williams confirmed that he understood the stipulated-evidence agreement and that he wanted to proceed based on the terms of the waiver. The district court received the parties' stipulated evidence and took the matter under advisement pending closing arguments by the parties.

In November, the district court found Williams guilty of Count I (threats of violence) and Count II (fourth-degree assault). The district court convicted Williams of

both counts but sentenced him on Count I only. And the district court ordered Williams to serve 18 months in prison, stayed for one day, with credit for 369 days.

This appeal follows.

DECISION

Williams contends that reversal is warranted based on a claimed violation of his rights to a speedy trial. He asserts the same speedy-trial claim in a self-represented supplemental brief. And Williams contends that his waiver of trial counsel was not knowing, intelligent, and voluntary, and that the dismissal of the two fifth-degree-assault counts deprived him of the opportunity to present a self-defense theory relating to the remaining counts. We address each argument in turn.

I. The district court did not err in denying Williams’s speedy-trial motions.

Criminal defendants have speedy-trial rights under both the United States and Minnesota Constitutions. U.S. Const. amend. VI; Minn. Const. art. I, § 6. Under Minnesota Rules of Criminal Procedure 11.09(b), a trial must begin within 60 days of a defendant’s speedy-trial demand “unless the [district] court finds good cause for a later trial date.” If a defendant has been deprived of their constitutional rights to a speedy trial, the criminal case against them must be dismissed. *State v. Jones*, 977 N.W.2d 177, 190 (Minn. 2022). “Whether the right to a speedy trial is violated is a constitutional question subject to de novo review.” *Id.* (quotation omitted).

Courts apply a four-factor balancing test under *Barker v. Wingo*, 407 U.S. 514, 530 (1972), to determine whether a speedy-trial violation has occurred. *State v. Zielinski*, 10 N.W.3d 1, 17 (Minn. 2024). The four *Barker* factors are: “(1) the length of the delay;

(2) the reason for the delay; (3) whether the defendant asserted . . . [their] right to a speedy trial; and (4) whether the delay prejudiced the defendant.” *Id.* (quotation omitted). “No factor is either a necessary or sufficient condition to the finding of a deprivation of the right of speedy trial.” *Jones*, 977 N.W.2d at 190 (quotation omitted). Rather, “the analysis of the right must be considered within the context of each case.” *State v. Paige*, 977 N.W.2d 829, 837 (Minn. 2022). Appellate courts “must engage in a difficult and sensitive balancing process, in which the conduct of both the State and the defendant are weighed.” *State v. Osorio*, 891 N.W.2d 620, 628 (Minn. 2017) (quotations and citation omitted).

With these principles in mind, we next analyze each *Barker* factor.

A. The Length of the Delay

The first *Barker* factor—the length of the delay—is the “triggering mechanism” that determines whether courts must conduct further review. *Paige*, 977 N.W.2d at 837. “[I]n Minnesota[,] a trial delayed more than 60 days past a defendant’s speedy-trial demand is presumptively prejudicial, meaning consideration of the other three *Barker* factors is required.” *Id.* at 838 (quotation and citation omitted). It is undisputed by the parties, and we agree based on our careful review of the record, that Williams’s trial ultimately began more than 60 days after he demanded a speedy trial on June 1 and December 28, 2023. Thus, we must consider the remaining three *Barker* factors. *See id.*

B. The Reason for the Delay

The second *Barker* factor—the reason for the delay—looks to “whether the government or the criminal defendant is more to blame for the delay.” *Jones*, 977 N.W.2d at 191 (quotation omitted). Courts must determine which party is responsible for the delay

and the specific reason for the delay because they “weigh various reasons differently.” *Osorio*, 891 N.W.2d at 628. “Deliberate delays intended to hinder the defense weigh heavily against the prosecution.” *Paige*, 977 N.W.2d at 838. But “[w]hen the overall delay in bringing a case to trial is the result of the defendant’s actions, there is no speedy trial violation.” *State v. DeRosier*, 695 N.W.2d 97, 109 (Minn. 2005); accord *Osorio*, 891 N.W.2d at 628–29. The Minnesota Supreme Court has held that “delay in bringing [a] matter to trial [that is] occasioned by defense motions,” including “a Rule 20 evaluation,” does not violate a defendant’s speedy-trial rights. *DeRosier*, 695 N.W.2d at 109.³ And if a district court “determines that there is a reasonable basis to doubt the defendant’s competency and there is probable cause for the charge(s), the court must suspend the criminal proceedings.” Minn. R. Crim. P. 20.01, subd. 3(b).⁴

³ Williams maintains that, rather than relying on the supreme court’s binding decision in *DeRosier*, our nonprecedential decision in *State v. Faulkner*, No. A07-1877, 2009 WL 510807, at *5 (Minn. App. 2009), *rev. denied* (Minn. May 27, 2009), should guide our application of the law. “Nonprecedential opinions . . . are not binding authority except as law of the case, res judicata or collateral estoppel, but nonprecedential opinions may be cited as persuasive authority.” Minn. R. Civ. App. 136.01, subd. 1(c). It is true that, in *Faulkner*, we stated that “[i]mproper rule 20 delays should not be completely removed from speedy-trial considerations because rule 20 is part of the criminal process.” 2009 WL 510807, at *5. But in that case, “[t]he state . . . provided no explanation for what caused” an 88-day delay while the defendant was in custody, “and the lack of explanation raise[d] the unavoidable impression that [the authorities], unfortunately, may have simply lost track of [the defendant].” *Id.* at *6. As explained below, that is not the case here. We therefore decline to disregard *Derosier* in favor of *Faulkner*. See *State v. Curtis*, 921 N.W.2d 342, 346 (Minn. 2018) (explaining that “[t]he court of appeals is bound by supreme court precedent, as it has repeatedly acknowledged[,]” and that “[a] defendant has a due process right not to be tried or convicted of a criminal charge if he is legally incompetent” (citing *Drope v. Missouri*, 420 U.S. 162, 171–72 (1975)) (other citations omitted)).

⁴ While not dispositive of the issue at hand, we note that the federal “Speedy Trial Act places no limits on the amount of time that may be spent on a competency proceeding” and

Williams asserts that the district court caused the delay because it did not require the state to prove that Williams was competent to stand trial and the state otherwise failed to meet its burden under rule 20.01 when it “submitted no evidence” at the May 26, 2023 hearing. The state counters that any delay is attributable to Williams, who failed to appear as ordered, did not participate in the requested rule 20.01 examination for six months, and requested multiple continuances.

We conclude that the preponderant reasons for the delay are attributable to Williams, including the multiple rule 20.01 competency proceedings in this case and in Williams’s Ramsey County cases—proceedings that ran from March 2023 until August 2024. At Williams’s first appearance on March 7, 2023, the district court orally granted defense counsel’s request for a competency evaluation, suspending the proceedings until the updated rule 20.01 forensic evaluation report was filed on May 25. The proceedings resumed the day after the updated rule 20.01 report was filed. Although he demanded a speedy trial on June 1 and the district court set a jury trial for July 24—which was within 60 days—Williams did not object to the court’s July 24 finding of good cause to continue the matter to August 14. That good-cause finding was based on the June 26 objection to the results of a rule 20.01 report in Williams’s Ramsey County cases, which remained unresolved as of July 24. On August 14, the district court again continued the jury trial

“requires that any period of delay for a competency proceeding be excluded from the . . . calculation.” *United States v. Harris-Franklin*, 146 F.4th 631, 640 (8th Cir. 2025) (quotations omitted).

because the Ramsey County rule 20.01 proceedings still had not concluded, and Williams waived his rights to a speedy trial.

After he failed to appear for a scheduled omnibus hearing on October 24 and was not arrested on the resulting bench warrant until December 5, Williams again demanded a speedy trial on December 28, and the district court scheduled the matter for February 12, which was within 60 days. But on February 12, 2024, Williams's counsel requested another rule 20.01 evaluation, which again resulted in the suspension of proceedings. Because Williams did not make himself available to the examiner, the rule 20.01 process went unresolved for six months and only concluded on August 8, when the district court found Williams competent and resumed the proceedings based on a July 22 rule 20.01 report that had been completed in one of his Ramsey County cases.

After the district court scheduled a jury trial for September 16, there were additional delays attributable to Williams: he discharged his attorney and requested advisory counsel on September 16; advisory counsel was unavailable on September 19; Williams filed motions on September 16, October 2, and October 7; and he eventually proceeded via a stipulated-evidence trial and needed to review the stipulated-evidence before agreeing to submit it to the district court. These issues prevented trial from starting on October 7—which was within 60 days of the proceedings that resumed on August 8—as scheduled by the district court on September 19.

Because the record reflects extensive delay attributable to Williams, this factor weighs against concluding that the district court erred in denying Williams's speedy-trial motions.

C. Whether Williams Asserted His Right to a Speedy Trial

The third factor—whether Williams asserted his right to a speedy trial— “must assess the forcefulness of [the defendant’s] speedy-trial demand.” *Paige*, 977 N.W.2d at 840; *see also State v. Mikell*, 960 N.W.2d 230, 252 (Minn. 2021) (instructing that the third factor “is entitled to strong evidentiary weight in determining whether the defendant was deprived of the right” (quotation omitted)). Courts determine whether a defendant took “any action . . . that could be construed as the assertion of the speedy trial right.” *State v. Windish*, 590 N.W.2d 311, 317 (Minn. 1999). Also relevant is a defendant’s conduct after making a speedy-trial demand, which could suggest that the demand was not “serious,” and whether the demand is “accompanied by actions that undermine the ability for the trial to occur.” *Paige*, 977 N.W.2d at 841; *see also Mikell*, 960 N.W.2d at 245 (considering whether “the defendant [was] serious about getting to trial promptly, which is good evidence that he perceived the delay as harmful”).

Williams demanded a speedy trial multiple times and moved to dismiss this matter based on his claims that the rule 20.01 process violated his speedy-trial rights. But Williams failed to appear at a hearing, requested continuances, filed motions, and did not participate in the rule 20.01 evaluation in 2024 for six months. Williams’s actions undermine the seriousness of his request. *See Paige*, 977 N.W.2d at 841; *see also Mikell*, 960 N.W.2d at 245.

We therefore conclude that this factor weighs against concluding that the district court erred in denying Williams’s speedy-trial motions or is otherwise neutral.

D. Whether the Delay Prejudiced Williams

The fourth factor—whether the delay prejudiced Williams—considers three interests: “(1) preventing oppressive pretrial incarceration; (2) minimizing a defendant’s anxiety and concern; and (3) preventing possible impairment of the defense.” *Paige*, 977 N.W.2d at 841. Courts consider each of these interests to determine the extent of the prejudice suffered by a defendant. *Id.* “Prejudice must be more than minimal to weigh in favor of a defendant.” *Id.* And the “stress, anxiety and inconvenience experienced by anyone who is involved in a trial is insufficient to demonstrate prejudice” establishing that a defendant’s speedy-trial rights have been violated. *Id.* at 842 (quotation omitted).

Williams argues that the significant jail credit he received toward his sentence establishes that he experienced oppressive pretrial incarceration. He also maintains that he experienced anxiety and concern over the delay, and that the delay exacerbated his mental-health concerns, which caused him to distrust and ultimately discharge his counsel. In turn, Williams claims, this impaired his ability to raise a legally complicated defense relating to mental illness.

As to preventing oppressive pretrial incarceration, Williams has not established that the jail credit he received stems from any delays other than those relating to his conduct over the course of this case—including his failure to appear—and his other pending criminal matters. We are not convinced that the record supports his claim of anxiety and concern over the delay, beyond that “experienced by anyone who is involved in a trial.” *Id.* (quotation omitted). And the record does not reflect that Williams ever attempted to assert a mental-illness defense, either through counsel or while he was self-represented. No notice

of defense regarding mental illness appears in the record. *See* Minn. R. Crim. P. 9.02, subd. 1(5)(c) (“The defense must inform the prosecutor in writing of any defense, other than not guilty, that the defendant intends to assert, including . . . mental illness A defendant who gives notice of intent to assert the defense of mental illness . . . must also notify the prosecutor of any intent to also assert the defense of not guilty.”).

Accordingly, this factor weighs against concluding that the district court erred in denying Williams’s speedy-trial motions.

E. Balancing the Factors

Although we are mindful that the length of the delay in bringing this matter to trial undisputedly raises a presumption of prejudice, the remaining factors either do not support or weigh against the conclusion that the district court erred in denying Williams’s speedy-trial motions. Consequently, we discern no error in the district court’s decision, and Williams’s speedy-trial claim fails.⁵

II. The district court did not clearly err in determining that Williams knowingly, intelligently, and voluntarily waived his right to counsel.

The United States Constitution and the Minnesota Constitution guarantee a criminal defendant the right to counsel. U.S. Const. amend. VI; Minn. Const. art. I, § 6. “A defendant may waive the constitutional right to counsel if that waiver is knowing, intelligent, and voluntary.” *State v. Turner*, 32 N.W.3d 546, 552 (Minn. 2026). “A district court judge has the serious and weighty responsibility of ensuring that a defendant’s waiver

⁵ For these reasons, we likewise reject the speedy-trial argument that Williams asserts in his self-represented supplemental brief.

of counsel is constitutionally valid.” *Id.* at 553 (quotations omitted). To ensure that a waiver is valid, “the district court should examine the facts and circumstances of the case, including the background, experience, and conduct of the accused.” *Id.* (quotation omitted). Appellate courts will overturn a district court’s finding that a waiver is knowing, voluntary, and intelligent only if that finding is clearly erroneous. *Id.* at 554 (stating that appellate courts apply the clearly erroneous standard of review “when an appellate court considers the validity of a defendant’s waiver of counsel”). “A district court’s finding is clearly erroneous when there is no reasonable evidence to support the finding or when an appellate court is left with the definite and firm conviction that a mistake occurred.” *Id.* at 553 (quotation omitted).

In his self-represented supplemental brief, Williams maintains that his “petition to proceed pro se was not a valid waiver” because he was not afforded the “right to consult counsel prior to the petition.” The state responds that “the district court went through a detailed waiver on the record, and in writing,” and that the court offered Williams the opportunity to speak with his former counsel about representing himself if he wished.

The district court’s determination that Williams knowingly, intelligently, and voluntarily waived his right to counsel is supported by reasonable evidence in the record, and we are not left with the definite and firm conviction that a mistake occurred. *See id.* at 553. Williams affirmatively waived his right to counsel orally on September 16 and 19, 2025, and in writing on September 19. As to Williams’s specific claim that he was not afforded the “right to consult counsel prior to the petition,” the district court told Williams at the September 19 hearing that it would reappoint counsel for him if he wished. Moreover,

the district court asked Williams if he wanted the opportunity to speak with his former counsel about representing himself, but Williams declined. Williams also affirmed that he had an opportunity to speak to his former counsel about the motions he filed. And after the district court reviewed with Williams the written “Petition to Proceed as Pro Se Counsel,” the district court filed the written petition, which Williams had completed and signed during the proceedings.

As a result, we conclude that the district court did not clearly err in determining that Williams knowingly, intelligently, and voluntarily waived his right to counsel.

III. Williams has forfeited his self-defense argument.

Williams argues in his self-represented supplemental brief that his ability to assert self-defense was impaired because “the state dropped the fifth-degree assault charges.” The state contends that “this is not the type of prejudice envisioned by the plain-error standard, nor is this supported by the facts.”

Because Williams cites no authority in support of this argument, it is inadequately briefed and therefore forfeited. *State v. Mrozinski*, 971 N.W.2d 233, 237–38 n.2 (Minn. 2022) (“An issue raised without argument or citation to legal authority in its support is forfeited.” (quotation omitted)).

Affirmed.