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IN THE SUPREME COURT OF IOWA

STATE OF IOWA, Plaintiff-Appellee, RHETT BRYAN WICKETT, Defendant-Appellant.	Supreme Court No.: 25-0639 Warren County Case No. AGCR035150

APPEAL FROM THE IOWA DISTRICT COURT FOR WARREN COUNTY

Hon. Kevin Parker

APPELLANT'S REPLY BRIEF

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No additional authorities are cited for reference beyond those provided in original briefing.

STATE'S FACTUAL STATEMENT

Wickett relies on original briefing regarding factual statements.

ARGUMENT

I. THE VERDICT IS NOT SUPPORTED BY SUFFICIENCY OF THE EVIDENCE

Wickett relies on original briefing to counter the State's arguments regarding sufficiency of the evidence.

II. THE DISTRICT COURT ABUSED DISCRETION IN IMPOSING CONSECUTIVE PRISON SENTENCES

The district court abused discretion in sentencing Wickett to prison, and the record does not provide support for the sentencing, even considering the broad discretion district courts are given at sentencing.

The State points to Wickett's criminal history to support the district court's decision to impose a prison sentence. While Wickett does have a prior record, that history is relatively limited in both scope and severity. (D0085, *Presentence Investigation Report*, 4/6/25). His most recent offense occurred in 2022, and there is no indication of any new or escalating criminal conduct since that time, other than

the current incident. Importantly, the most recent incident is limited to public intoxication and interference with official acts. (D0085 a5 4). To the extent the district court relied on this history, it failed to account for both its limited nature and the absence of recent offenses.

Further, Wickett has demonstrated that he can succeed on probation. (D0085 at 4). During prior periods of supervision, he complied with conditions and successfully discharged, showing that, when provided with structure and appropriate support, he can function successfully in the community. This history weighs in favor of a probationary sentence and undercuts the conclusion that a prison term is necessary to achieve compliance or protect the public.

Perhaps most importantly though, the record reflects that Wickett has struggled with significant mental health issues, including suicide attempts. (D0085 at 11). These circumstances highlight a critical need for consistent, intensive mental health treatment that is available in the community, not in prison. Incarceration is ill-suited to address Wickett's individualized needs, as access to meaningful, individualized treatment in a prison setting is often limited or delayed. By contrast, community-based supervision would allow Wickett to engage in inpatient or outpatient treatment programs for both mental health and substance related issues, providing a far more effective avenue for rehabilitation and long-term stability.

A probationary sentence, coupled with stringent conditions tailored to Wickett's needs, would have fully satisfied rehabilitation goals. Considering Wickett's limited criminal history, his demonstrated ability to succeed under supervision, and his clear need for treatment that is best provided in the community, a prison sentence was an abuse of discretion. A structured probationary sentence with comprehensive treatment conditions would have been a more appropriate and effective alternative.

CONCLUSION

The district court abused discretion by imposing a two-year term of incarceration. Wickett requests the District Court's order be reversed, and this matter remanded for resentencing.

CERTIFICATE OF PRODUCTION COSTS

I certify my total printing cost for this Reply Brief is $1.60.

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CERTIFICATE OF FILING:

I, Nathan Olson, certify I electronically filed Appellant's Reply Brief with the Clerk of the Supreme Court on March 24, 2026.

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CERTIFICATE OF SERVICE:

I, Nathan Olson, certify Appellant's Reply Brief was served on March 24, 2026:

- By EDMS on Assistant Attorney General, Criminal Appeals Division
- By United States Postal Service to Rhett Wickett

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/s/ Nathan A. Olson March 24, 2026
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