

# *United States v. Guiteau*

Federal Trials and Great Debates  
in United States History

## **Case Summary:**

- Charles Guiteau was tried for the assassination of President James Garfield.
- Guiteau claimed he was inspired to kill the President by God; his lawyers claimed he was insane.
- Guiteau was convicted and executed.
- Though his trial was often chaotic, it enhanced the public trust in the federal courts and helped shape two important areas of the law: federal criminal jurisdiction and the insanity defense.

## **History of the Case:**

Charles Guiteau was an unusual man. He had drifted from life on a religious commune to failures as a lawyer, writer, and preacher. He often stayed for short periods in boarding houses with no means of paying the owners and ran from town to town, staying just ahead of the law. Many of his acquaintances and family members considered him insane.

Guiteau himself believed that he was destined for greatness. In 1880, he tried to ingratiate himself with leaders of the Republican Party in an attempt to reinvent himself as a statesman. He gave a single failed speech before a small audience. Despite this, however, he claimed to have been responsible for James Garfield's election as President. After the election, he demanded glamorous offices working in foreign embassies from Garfield and his Secretary of State James Blaine.

After Blaine angrily refused him, Guiteau became convinced that Blaine had turned Garfield against Guiteau and the "stalwart" faction of the Republican Party with whom Guiteau aligned himself. Guiteau claimed that God inspired him to "remove" Garfield and resolve the political struggles dividing the Republican Party. He tracked Garfield's movement for several days before shooting him twice in a Washington, D.C., train station on July 2, 1881. The second bullet entered Garfield's lower back, broke two ribs, damaged his spine, and lodged near his pancreas. The President struggled to recover for more than two months, the nation following every development in horror. He died on September 19 while convalescing on the New Jersey shore.

Guiteau was captured at the scene and stood trial in the Supreme Court of the District of Columbia ("SCDC"), a federal court that exercised criminal jurisdiction over the Nation's Capital. Guiteau's primary lawyer in the case was his brother-in-law, a real estate attorney from Illinois who, while capable, had no experience in Washington's courts and almost no experience in criminal law. The prosecution team was comprised of three leading criminal lawyers from New York and Washington.

The trial posed a significant challenge for the judiciary, which faced competing pressures to punish Garfield's assassin and demonstrate that it could deal fairly with even the most reviled defendants. Guiteau's absurd behavior at trial proved an additional difficulty for the presiding judge, Associate Justice Walter Cox. Since Guiteau offered a form of insanity defense, Cox believed Guiteau needed to be present for the jury to evaluate his sanity. Nonetheless, the defendant's repeated outbursts threatened to derail the trial and led many observers to criticize the judge.

The prosecution called several eyewitnesses, including Blaine, who was with the President when Guiteau shot him. In the light of this evidence, there was little doubt that Guiteau had shot Garfield. Instead, the primary issues in the case were whether Guiteau was insane and whether the court had jurisdiction over the case. Prosecutors believed the case was correctly brought in the District of Columbia's federal courts, because Guiteau fired the fatal shots in Washington. Congressional statutes gave federal courts

jurisdiction over areas under federal control, which the prosecution argued included the District of Columbia. However, Guiteau and his lawyers argued that since Garfield died in New Jersey, the Court did not have jurisdiction. Although there was some precedent suggesting that a court did not have jurisdiction over a murder case in which the death had occurred elsewhere, Justice Cox ultimately ruled that the SCDC had jurisdiction.

The jury had to determine the issue of Guiteau's sanity. Guiteau claimed a slightly different version of the insanity defense than his lawyers offered to the court. Guiteau argued that he was commanded to kill by God and thus did not have free will when he committed the murder. His lawyers argued that Guiteau suffered from insane delusions and was unable to make moral judgments as a result. The prosecution called a number of medical experts to contradict these claims. Their theory was that Guiteau's track record of strange behavior did not reflect Guiteau's insanity. Instead, they claimed, it showed that Guiteau was a deceitful and self-obsessed man, who killed the President for notoriety and political revenge.

In instructing the jury on the law, Justice Cox employed an insanity standard borrowed from England. This standard relieved a defendant from guilt only if he was unaware of his actions or could not understand that they were wrong. Arguably, Guiteau's own testimony about his plans to kill Garfield and his doubts about whether it was the right thing to do condemned him under this standard.

After months of testimony and weeks of argument in the case, the jury took around an hour to convict Guiteau. Justice Cox sentenced him to death. He attempted without success to overturn his conviction on appeal and on a writ for habeas corpus. After President Chester Arthur, who became President on Garfield's death, refused appeals for clemency, Guiteau was hanged on June 30, 1882.

Many observers at the time celebrated the verdict in *Guiteau* and lauded Justice Cox's fairness. Nevertheless, since Guiteau's execution, an increasing number of experts have argued that he was, in fact, insane. There is at least some evidence to support this view. A postmortem suggested that Guiteau may have suffered from syphilis, a disease that can affect the brain, and legal and medical definitions of insanity have evolved since the case.

### **Legal Issues:**

- Did the SCDC have jurisdiction over the case?
- What was the legal insanity standard in the District of Columbia?
- Was Charles Guiteau insane when he killed President Garfield?

### **Questions for Discussion:**

- Some modern commentators have suggested that Guiteau might well have been acquitted if he had failed to harm Garfield or if he had shot a less prominent victim. How plausible is this claim? Should the severity of the crime matter in insanity cases?
- This trial was one of the most widely reported in nineteenth-century America. What special challenges might this pose for the judge and jury?
- American law has recognized some form of insanity defense since the nation's founding, yet the defense remains controversial. Why might this be?