

United States v. Wilhelm

The district court denied defendants the right to be represented at trial by a non-lawyer who was not a member of the bar. The appellate court held that the district court did not abuse its discretion in denying defendants representation by a lay person unlearned in the law. While both the right of self-representation and the right to assistance of counsel exist, the Constitution does not give the right to delegate the power of self-representation to lay persons who do not qualify to render the assistance of counsel. Defendants had no constitutional right to insist upon lay representation.