

SUPREME COURT OF DELAWARE

Lacombe v. State

Lacombe · No. No. 376, 2025 · Decided December 29, 2025

SUMMARY

The Delaware Supreme Court affirmed the Superior Court’s summary dismissal of Claude Lacombe’s successive motion for postconviction relief. The Court held that Lacombe’s challenges to his convictions and counsel’s effectiveness were procedurally barred under Superior Court Criminal Rule 61, and that his sentence was neither illegal under *Erlinger v. United States* nor disproportionate under the Eighth Amendment.

CASE DETAILS

COURT	Supreme Court of Delaware
WRITING FOR THE COURT	Chief Justice Seitz; Justice Valihura; Justice Traynor
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	December 29, 2025
DOCKET	No. 376, 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Superior Court's summary dismissal of a successive motion for postconviction relief; the State moved to affirm.
PRECEDENTIAL VALUE	published
PARTIES	Claude Lacombe v. State of Delaware

TOPICS

- state post-conviction relief
- post-conviction relief
- criminal procedure
- sentencing
- appellate procedure

PRACTICE AREAS

- criminal procedure
- post-conviction relief
- appellate procedure
- sentencing
- constitutional law

QUESTIONS PRESENTED

- Whether Lacombe's claims challenging his convictions and the effectiveness of his counsel were procedurally barred under Superior Court Criminal Rule 61.

2. Whether Lacombe's sentence was illegal under *Erlinger v. United States* because the sentence was imposed within the applicable statutory ranges.
3. Whether Lacombe's sentence was disproportionate under the Eighth Amendment.

HOLDINGS

1. Lacombe's claims challenging his convictions and the effectiveness of his counsel were procedurally barred under Superior Court Criminal Rule 61.
2. The sentence was not illegal because it was imposed within the applicable statutory ranges.
3. Lacombe's sentence was not disproportionate under the Eighth Amendment.

KEY QUOTATIONS

“The Superior Court correctly determined that the appellant’s claims challenging his convictions and the effectiveness of his counsel are procedurally barred under Superior Court Rule of Criminal Procedure 61.”
(at 1)

*“Moreover, because the Superior Court imposed a sentence within the applicable statutory ranges, his sentence is not illegal under *Erlinger v. United States*.”* (at 1)

“This Court has previously held that the appellant’s sentence is not disproportionate under the Eighth Amendment.” (at 1)

FACTUAL BACKGROUND

Lacombe sought postconviction relief from his criminal convictions, including claims challenging the convictions and the effectiveness of his counsel. He also challenged the legality and proportionality of his sentence, arguing that the sentence was illegal under *Erlinger v. United States* and disproportionate under the Eighth Amendment. The Superior Court summarily dismissed the successive motion.

PROCEDURAL HISTORY

The Superior Court adopted a commissioner's report recommending summary dismissal of Lacombe's successive motion for postconviction relief. The court held that his claims challenging his convictions and counsel's effectiveness were procedurally barred, and that his sentence was not illegal or disproportionate. The Delaware Supreme Court granted the State's motion to affirm and affirmed the Superior Court's judgment.

DISPOSITION

affirmed

CASES CITED

- *State v. LaCombe*, 2025 WL 2409919 (Del. Super. Ct. Aug. 18, 2025)
- *Erlinger v. United States*, 602 U.S. 821 (2024)
- *Anderson v. State*, 2025 WL 3012920 (Del. Oct. 24, 2025)

- Lacombe v. State, 2014 WL 2522273 (Del. May 30, 2014)

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