

LOUISIANA COURT OF APPEAL, FOURTH CIRCUIT

State of Louisiana v. Jeremy Dillion

State of Louisiana v. Dillion, No. 2025-KA-0533 (La. Ct. App. 4 Cir. Mar. 19, 2026) · No. 2025-KA-0533 ·
Decided March 19, 2026

SUMMARY

The Louisiana Fourth Circuit affirmed the adjudication of Jeremy Dillion as a quadruple felony offender and his resentencing to forty years for home invasion, concurrent with his six-month sentence for simple battery. The court held that the State sufficiently proved the predicate felony convictions, Dillion’s identity, and the applicable cleansing periods. The court also rejected his claims concerning delay in the habitual offender hearing, a right to jury determination of habitual offender status, and excessive sentencing, including on preservation grounds where applicable.

CASE DETAILS

COURT	Louisiana Court of Appeal, Fourth Circuit
WRITING FOR THE COURT	Karen K. Herman; Sandra Cabrina Jenkins; Rachael D. Johnson
JURISDICTION	Louisiana Court of Appeal, Fourth Circuit
DECIDED	March 19, 2026
DOCKET	2025-KA-0533
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed a district-court judgment adjudicating him a quadruple felony offender, vacating his original sentence for home invasion, and resentencing him to forty years at hard labor.
STANDARD OF REVIEW	The court reviewed the sufficiency of the State's proof of habitual-offender status, the reasonableness of the delay in holding the multiple-offender hearing, and preserved sentencing claims. Because Dillion did not object to or move to reconsider his sentence, review of the sentence was limited to constitutional excessiveness.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Jeremy Dillion v. State of Louisiana

TOPICS

- sentencing
- criminal procedure
- appellate procedure
- speedy trial
- standard of review

PRACTICE AREAS

criminal law

criminal procedure

appellate sentencing

QUESTIONS PRESENTED

1. Whether the State sufficiently proved Dillion's status as a fourth felony offender, including whether attempted unauthorized use of a motor vehicle was a valid predicate offense, whether the State had to prove the vehicle's value, whether Dillion's identity as the person previously convicted was established, and whether the applicable cleansing periods were satisfied.
2. Whether the approximately two-year delay between filing the habitual-offender bill and the multiple-offender hearing violated Dillion's speedy-trial rights.
3. Whether Dillion was entitled to have his multiple-offender status determined by a jury.
4. Whether the forty-year enhanced sentence was indeterminate or excessive because the district court did not identify the applicable habitual-offender statutory subsection or expressly discuss the sentencing factors.

HOLDINGS

1. The State sufficiently proved Dillion's status as a fourth felony offender even though it did not prove one alleged predicate conviction. The four other predicate felony convictions and Dillion's identity as the person convicted were established by competent evidence.
2. Attempted unauthorized use of a motor vehicle is a valid responsive verdict and may serve as a predicate felony conviction for habitual-offender enhancement.
3. The State presented sufficient evidence that the applicable cleansing periods had not expired between Dillion's predicate convictions and subsequent offenses.
4. The approximately two-year delay in holding the multiple-offender hearing did not violate Dillion's speedy-trial rights.
5. Dillion could not obtain appellate relief on his claim that he was entitled to a jury determination of multiple-offender status because he failed to raise the constitutional issue in the district court.
6. The forty-year sentence was not indeterminate or constitutionally excessive, and the district court's failure to specify whether it sentenced under La. R.S. 15:529.1(A)(4)(a) or (b) did not require relief because the sentence fell within the permissible range under either subsection.

KEY QUOTATIONS

“To prove a defendant is a habitual offender under La. R.S. 15:529.1, the State is required to establish the prior felony conviction and that the defendant is the same person convicted of that felony.” (8)

“It is sufficient to match fingerprints on an arrest register to a defendant, and then match the arrest register to a bill of information and other documents evidencing conviction and sentence; this can [be] done through a date of birth, social security number, bureau of identification number, case number, specifics and details of the offense charged, etc.” (8)

“Those factors are the length of the delay, the reasons for the delay, the accused’s assertion of his right to speedy trial, and the prejudice to the accused resulting from the delay.” (13)

“Even though a sentence under the Habitual Offender Law is the minimum provided by that statute, the sentence may still be unconstitutionally excessive if it makes no measurable contribution to acceptable goals of punishment, or is nothing more than the purposeful imposition of pain and suffering and is grossly out of proportion to the severity of the crime.” (19)

FACTUAL BACKGROUND

At the habitual-offender hearing, a Louisiana State Police criminal-records supervisor and fingerprint-identification expert compared Dillion's fingerprints with fingerprint cards associated with four prior felony convictions. The records also matched Dillion's birthdate, state identification number, physical description, address, case numbers, bills of information, and conviction documents. The State did not introduce evidence of one additional alleged predicate conviction, but the court found that four other felony convictions were sufficiently proved and occurred within the applicable cleansing periods.

PROCEDURAL HISTORY

A jury convicted Dillion of home invasion and the responsive verdict of simple battery. The district court originally sentenced him to twenty-five years for home invasion and six months for simple battery, and the Louisiana Fourth Circuit affirmed those convictions and sentences. After the State filed and amended a habitual-offender bill, the district court held a multiple-offender hearing, adjudicated Dillion a quadruple felony offender, vacated the original home-invasion sentence, and imposed forty years at hard labor, concurrent with the six-month sentence; Dillion appealed.

DISPOSITION

affirmed

CASES CITED

- State v. Dillion, 2023-0453, p. 1 (La. App. 4 Cir. 11/17/23), 377 So.3d 820, 822
- State v. Vincent, 2010-0764, p. 1 (La. App. 4 Cir. 1/19/11), 56 So.3d 408, 410
- State v. Coleman, 2002-1487, p. 5 (La. App. 4 Cir. 10/9/02), 830 So.2d 341, 343
- State v. Williams, 2000-0011, p. 19 (La. App. 4 Cir. 5/9/01), 788 So.2d 515, 530
- State v. Anderson, 99-1407, p. 6 (La. App. 4 Cir. 1/26/00), 753 So.2d 321, 325
- State v. White, 2013-1525, p. 2 (La. 11/8/13), 130 So.3d 298, 300
- State v. Brown, 2011-1656, p. 2 (La. 2/10/12), 82 So.3d 1232, 1234
- State v. Brazell, 2017-0032, p. 22 (La. App. 4 Cir. 4/18/18), 245 So.3d 15, 34
- State v. Robair, 2013-0337, pp. 5-7 (La. App. 4 Cir. 1/15/14), 133 So.3d 96, 100-01
- State v. Turner, 365 So.2d 1352, 1355 (La. 1978)
- State v. Tatten, 2012-0443, pp. 10-11 (La. App. 4 Cir. 5/1/13), 116 So.3d 843, 849-50

- State v. Kisack, 2016-0797, p. 6 (La. 10/18/17), 236 So.3d 1201, 1205
- State v. Muhammad, 2003-2991, pp. 14-17 (La. 5/25/04), 875 So.2d 45, 55-56
- Barker v. Wingo, 407 U.S. 514, 531-32 (1972)
- State v. Buckley, 2011-0369, p. 7 (La. App. 4 Cir. 12/27/11), 88 So.3d 482, 487
- Chaumont v. City of New Orleans, 2020-0017, p. 5 (La. App. 4 Cir. 6/3/20), 302 So.3d 39, 45-46
- Council of City of New Orleans v. Washington, 2009-1067, pp. 3-4 (La. 5/29/09), 9 So.3d 854, 856-57
- Mosing v. Domas, 2002-0012 (La. 10/15/02), 830 So.2d 967
- Vallo v. Gayle Oil Co., 1994-1238 (La. 11/30/94), 646 So.2d 859
- State v. Hatton, 2007-2377, p. 14 (La. 7/1/08), 985 So.2d 709, 719
- Hardy v. Juvenile Justice Intervention Center, 2021-0715, p. 5 (La. App. 4 Cir. 6/15/22), 342 So.3d 1076, 1080
- State v. Banks, 2023-0806, p. 5 (La. App. 4 Cir. 5/24/24), 391 So.3d 24, 28
- State v. Manuel, 2021-0273, p. 14 (La. App. 4 Cir. 4/6/22), 337 So.3d 967, 974-75
- State v. Ferguson, 2019-01247, p. 2 (La. 12/22/20), 307 So.3d 198
- State v. Johnson, 97-1906, pp. 5-9 (La. 3/4/98), 709 So.2d 672, 675, 677
- State v. Dorthey, 623 So.2d 1276, 1280-81 (La. 1993)
- State v. Young, 94-1636, p. 5 (La. App. 4 Cir. 10/26/95), 663 So.2d 525, 527
- State v. Landfair, 2010-1693, pp. 5-6 (La. App. 4 Cir. 7/20/11), 70 So.3d 1061, 1065-66