

SUPREME COURT OF ARKANSAS

Ratliff v. Kelley

541 S.W.3d 408 (Ark. 2018) · Decided March 29, 2018

SUMMARY

The Arkansas Supreme Court affirmed the denial of Johnny Ratliff’s pro se petition for a writ of habeas corpus. The court held that his challenges to sentence enhancements and competency-related evidence alleged trial or due-process errors that did not implicate the facial validity of the judgment or the trial court’s jurisdiction. The court also noted a clerical error misidentifying the felony class but concluded that the sentence remained facially valid.

CASE DETAILS

COURT	Supreme Court of Arkansas
WRITING FOR THE COURT	Rhonda K. Wood
JURISDICTION	Arkansas
DECIDED	March 29, 2018
DISPOSITION	affirmed
PROCEDURAL POSTURE	Ratliff appealed the circuit court's denial of his pro se petition for a writ of habeas corpus.
STANDARD OF REVIEW	A circuit court's decision on a petition for a writ of habeas corpus is upheld unless clearly erroneous.
PRECEDENTIAL VALUE	Published Arkansas Supreme Court opinion
PARTIES	Johnny Ratliff v. Kelley

TOPICS

- state post-conviction relief
- habeas corpus
- post-conviction relief
- criminal procedure
- appellate procedure

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether Ratliff's challenges to the evidence supporting sentence enhancements and the competency determination were cognizable in a state habeas proceeding.

2. Whether limiting habeas relief to claims that the trial court lacked jurisdiction or that the commitment was invalid on its face unconstitutionally suspended the writ.
3. Whether the clerical felony-classification error in the judgment rendered the commitment invalid on its face.

HOLDINGS

1. A writ of habeas corpus is available only when the petitioner demonstrates that the trial court lacked jurisdiction or that the commitment is invalid on its face.
2. Challenges to the admission or sufficiency of trial evidence, including evidence supporting sentence enhancements or a competency determination, are not cognizable in a habeas proceeding when they do not implicate the facial validity of the judgment or the trial court's jurisdiction.
3. A clerical error identifying the conviction as a Class-Y felony rather than a Class-B felony does not invalidate the judgment when the imposed sentence is within the statutory range for both classifications.
4. Limiting habeas relief to jurisdictional defects and facial invalidity does not unconstitutionally suspend the writ because the General Assembly may establish the procedural mechanism for obtaining habeas relief.

FACTUAL BACKGROUND

Ratliff's judgment and commitment order reflected a Class-Y felony, although he had been charged with and convicted of a Class-B felony. His thirty-year sentence fell within the statutory range for both classifications under the applicable habitual-offender statute. In his habeas petition and appeal, Ratliff challenged the evidence supporting sentence enhancements and the evidence supporting the trial court's competency determination.

PROCEDURAL HISTORY

Ratliff was convicted of a Class-B felony and received a thirty-year sentence with sentence enhancements for prior convictions. The Supreme Court of Arkansas previously affirmed the judgment. Ratliff later filed a habeas petition alleging insufficient evidence for the sentence enhancements and incompetence at the time of the crimes and at trial. The circuit court denied relief, and the Supreme Court of Arkansas affirmed.

DISPOSITION

affirmed

CASES CITED

- Ratliff v. State, 359 Ark. 479, 199 S.W.3d 79 (2004)
- Philyaw v. Kelley, 2015 Ark. 465, 477 S.W.3d 503
- Garrison v. Kelley, 2018 Ark. 8, 534 S.W.3d 136
- Renshaw v. Norris, 337 Ark. 494, 989 S.W.2d 515 (1999)
- Williams v. Kelley, 2017 Ark. 200, 521 S.W.3d 104

- Vance v. State, 2011 Ark. 243, 383 S.W.3d 325

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