

SUPREME COURT OF ARKANSAS

Charles E. Goodwin v. Dexter Payne, Director, Arkansas Department of Correction

2022 Ark. 122 (2022) · No. CV-21-270 · Decided June 2, 2022

SUMMARY

The Supreme Court of Arkansas affirmed the denial of Charles E. Goodwin’s pro se petition for a writ of habeas corpus. The court held that Goodwin’s claims of actual innocence, insufficient evidence, due-process violations, and trial error did not establish a cognizable basis for habeas relief because they did not challenge the facial validity of the judgment or the trial court’s jurisdiction. Claims raised below but not reasserted on appeal were deemed abandoned.

CASE DETAILS

COURT	Supreme Court of Arkansas
JURISDICTION	Arkansas
DECIDED	June 2, 2022
DOCKET	CV-21-270
DISPOSITION	affirmed
PROCEDURAL POSTURE	Goodwin appealed pro se from the Lee County Circuit Court's denial of his petition for a writ of habeas corpus.
STANDARD OF REVIEW	The Supreme Court of Arkansas will uphold a circuit court's decision on a petition for writ of habeas corpus unless it is clearly erroneous.
PRECEDENTIAL VALUE	Published Arkansas Supreme Court opinion; precedential
PARTIES	Charles E. Goodwin v. Dexter Payne, Director, Arkansas Department of Correction

TOPICS

- state post-conviction relief
- habeas corpus
- actual innocence
- appellate procedure
- due process

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether Goodwin's allegation that insufficient evidence supported his conviction stated a cognizable claim for habeas relief.
2. Whether Goodwin's actual-innocence allegation entitled him to habeas relief outside the statutory procedure for scientific testing under Act 1780 of 2001.
3. Whether Goodwin's conclusory due-process allegations and alleged trial errors implicated the facial validity of the judgment or the circuit court's jurisdiction.

HOLDINGS

1. A habeas proceeding is limited to challenges to the facial validity of the commitment order or the trial court's jurisdiction and cannot be used to challenge the sufficiency of the evidence supporting the conviction.
2. A petitioner alleging actual innocence must proceed under Act 1780 of 2001 and demonstrate entitlement to scientific testing to prove actual innocence; an ordinary assertion of innocence does not independently support habeas relief.
3. Assertions of trial error and due-process violations do not implicate the facial validity of the judgment or the trial court's jurisdiction and are not cognizable in habeas proceedings.
4. The circuit court did not clearly err in denying Goodwin's petition for failure to demonstrate probable cause for issuance of the writ.

KEY QUOTATIONS

“But this court’s long-standing interpretation of the statute remains the law—a habeas inquiry is limited to the face of the commitment order and is not a means to challenge the sufficiency of the evidence.” (at 2)

“In any event, assertions of trial error and due-process violations do not implicate the facial validity of the judgment or the jurisdiction of the trial court and are not cognizable in habeas proceedings.” (at 2)

FACTUAL BACKGROUND

In 2007, a jury convicted Goodwin of attempting to murder the owner of a clothing store during an aggravated robbery, and the circuit court sentenced him to life imprisonment as a habitual offender. The trial evidence included the victim's testimony, testimony from another witness who was present when Goodwin entered the store, and Goodwin's taped confession. Goodwin later sought habeas relief, alleging actual innocence, due-process violations, and trial error.

PROCEDURAL HISTORY

A jury convicted Goodwin in 2007 of attempted capital-felony murder, with aggravated robbery as the underlying felony, and he was sentenced as a habitual offender to life imprisonment. The Arkansas Supreme Court affirmed his conviction on direct appeal. The Lee County Circuit Court denied his habeas petition for failure to establish probable cause for issuance of the writ, and the Arkansas Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- Goodwin v. State, 373 Ark. 53, 281 S.W.3d 258 (2008)
- Hobbs v. Gordon, 2014 Ark. 225, 434 S.W.3d 364
- Philyaw v. Kelley, 2015 Ark. 465, 477 S.W.3d 503
- Leach v. Kelley, 2020 Ark. 200, 600 S.W.3d 568
- Owens v. Payne, 2020 Ark. 413, 612 S.W.3d 169

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