

LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

State of Louisiana v. Tyrone M. Sajna

No. 2026 KW 0331 (1st Cir. 2026) (La. Ct. App. 2026) · No. 2026 KW 0331 · Decided June 1, 2026

SUMMARY

The Louisiana Court of Appeal, First Circuit, granted in part and denied in part Tyrone M. Sajna’s supervisory writ application concerning postconviction relief. The court vacated the district court’s ruling in part, ordered production of voir dire transcripts for the petitioner’s Batson claim if they had not already been produced, and directed the district court to allow supplementation and determine whether the claim could be resolved summarily or required an evidentiary hearing.

CASE DETAILS

COURT	Louisiana Court of Appeal, First Circuit
WRITING FOR THE COURT	Theriot, J.; Balfour, J.; Haggerty, J., serving pro tempore by special appointment
JURISDICTION	Louisiana Court of Appeal, First Circuit
DECIDED	June 1, 2026
DOCKET	2026 KW 0331
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Application for supervisory writs arising from the denial of an application for postconviction relief.
PRECEDENTIAL VALUE	Unknown
PARTIES	Tyrone M. Sajna v. State of Louisiana

TOPICS

- state post-conviction relief
- post-conviction relief
- jury selection
- criminal procedure
- appellate procedure

PRACTICE AREAS

- criminal procedure
- postconviction relief
- appellate procedure
- jury selection

QUESTIONS PRESENTED

- Whether Sajna demonstrated a particularized need for voir dire transcripts to support his postconviction claim that the State violated Batson v. Kentucky through the improper use of peremptory challenges.

2. Whether the district court should provide the voir dire transcript free of charge and allow Sajna a reasonable opportunity to supplement his postconviction application.
3. Whether relief should be granted on Sajna's other claims.

HOLDINGS

1. A postconviction applicant who identifies with reasonable specificity a constitutional claim based on alleged errors during voir dire that might entitle the applicant to relief has demonstrated a particularized need for the voir dire transcripts.
2. After producing the voir dire transcript, the district court must allow Sajna reasonable time to supplement his postconviction application with record support for the Batson claim and then determine whether the claim can be resolved summarily or requires an evidentiary hearing.

KEY QUOTATIONS

“Relator has identified with reasonable specificity that his constitutional claims relating to alleged errors during voir dire might entitle him to postconviction relief. Therefore, he has demonstrated a “particularized need” for the voir dire transcripts.”

FACTUAL BACKGROUND

Sajna asserted in his postconviction application that the State improperly used peremptory challenges during voir dire in violation of *Batson v. Kentucky*, thereby depriving him of a fair and impartial trial. He sought the voir dire transcripts to support that constitutional claim and identified the claim with reasonable specificity.

PROCEDURAL HISTORY

Sajna applied for supervisory writs from the Eighteenth Judicial District Court, Parish of West Baton Rouge, challenging the district court's ruling on his application for postconviction relief. The court of appeal granted the writ in part, vacated the district court's ruling in part as to Sajna's Batson-based voir dire claim, ordered production of the voir dire transcript if it had not already been produced, and denied relief in all other respects.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

If it has not already done so, the district court must produce the voir dire transcript free of charge, allow Sajna reasonable time to supplement his postconviction application with record support for the Batson claim, and then determine whether the claim can be resolved summarily or requires an evidentiary hearing. The writ application is denied in all other respects.

CASES CITED

- *Batson v. Kentucky*, 476 U.S. 79, 106 S. Ct. 1712, 90 L. Ed. 2d 69 (1986)

- United States v. MacCollom, 426 U.S. 317, 324, 96 S. Ct. 2086, 2091, 48 L. Ed. 2d 666 (1976)
- State ex rel. Bernard v. Criminal District Court Section "J", 94-2247 (La. 4/28/95), 653 So. 2d 1174, 1175

OPINION

PER CURIAM.

STATE OF LOUISIANA COURT OF APPEAL, FIRST CIRCUIT STATE OF LOUISIANA NO. 2026 KW 0331 VERSUS TYRONE M. SAJNA JUNE 1, 2026 In Re: Tyrone M. Sajna, applying for supervisory writs, 18th Judicial District Court, Parish of West Baton Rouge, No. 210535. BEFORE: THERIOT, BALFOUR, AND HAGGERTY, JJ. WRIT GRANTED IN PART AND DENIED IN PART.

The ruling of the district court on the application for postconviction relief is vacated, in part, regarding relator's claim he was denied the right to a fair and impartial trial due to the State's improper use of peremptory challenges during voir dire in violation of Batson v. Kentucky, 476 U.S. 79, 106 S.Ct. 1712, 90 L.Ed.2d 69 (1986). Relator has identified with reasonable specificity that his constitutional claims relating to alleged errors during voir dire might entitle him to postconviction relief.

Therefore, he has demonstrated a "particularized need" for the voir dire transcripts. Accordingly, if it has not already done so, the district court is ordered to produce this transcript free of charge, see United States v. MacCollom, 426 U.S. 317, 324, 96 S.Ct. 2086, 2091, 48 L.Ed.2d 666 (1976); State ex rel. Bernard v. Criminal District Court Section "J", 94-2247 (La.

4/28/95), 653 So.2d 1174, 1175, and then afford relator reasonable time to supplement his postconviction application with support from the record for only this claim. Thereafter, the district court shall determine whether the claim can be resolved summarily or require an evidentiary hearing. See La. Code Crim. P. arts. 929(A) 6 930(A).

In all other respects, the writ application is denied. MRT KEB BDH URT OF APPEAL, FIRST CIRCUIT bey yon AD XV. Lh PUTY CLERK OF COURT. FOR THE COURT | Haggerty, J., serving pro tempore, by special appointment of the Louisiana Supreme Court.