

SUPREME COURT OF ARKANSAS

Chris Allen Oliger v. State of Arkansas

2026 Ark. 30 · No. CR-25-359 · Decided February 12, 2026

SUMMARY

The Supreme Court of Arkansas affirmed the denial and dismissal of Chris Allen Oliger’s petition for postconviction relief under Arkansas Rule of Criminal Procedure 37.1. The court rejected his ineffective-assistance claims concerning a purported laptop recording and unidentified DNA, concluding that the claims lacked factual support and did not establish prejudice. The court also held that his Brady and prosecutorial-misconduct claims were either unsupported or not cognizable in a Rule 37.1 proceeding.

CASE DETAILS

COURT	Supreme Court of Arkansas
WRITING FOR THE COURT	Cody Hiland
JURISDICTION	Supreme Court of Arkansas
DECIDED	February 12, 2026
DOCKET	CR-25-359
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial and dismissal of a petition for postconviction relief under Arkansas Rule of Criminal Procedure 37.1.
STANDARD OF REVIEW	The denial of postconviction relief is reviewed for clear error. A finding is clearly erroneous when, despite supporting evidence, the reviewing court is left with a definite and firm conviction that an error occurred.
PRECEDENTIAL VALUE	Published Arkansas Supreme Court opinion
PARTIES	Chris Allen Oliger v. State of Arkansas

TOPICS

- post-conviction relief
- ineffective assistance
- prosecutorial misconduct
- evidence
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether trial counsel was ineffective for failing to investigate an allegedly exculpatory laptop and recording.
2. Whether trial counsel was ineffective for failing to obtain DNA testing comparing Mark Mathis's DNA with an unidentified partial profile found on a knife.
3. Whether Oliger's Brady claim was cognizable in a Rule 37.1 postconviction proceeding.
4. Whether Oliger's claim that the prosecution suborned perjury was cognizable in a Rule 37.1 postconviction proceeding.

HOLDINGS

1. Oliger failed to establish ineffective assistance because he offered no factual support that the laptop contained an exculpatory recording or that counsel failed to investigate potentially exculpatory evidence.
2. Counsel was not ineffective for declining to seek DNA testing of the folding knife because Oliger did not show that the knife was the murder weapon, did not show that testing would implicate Mathis, and could not demonstrate a reasonable probability of a different trial outcome.
3. Oliger's Brady claim was not cognizable in a Rule 37.1 proceeding because he knew about the alleged laptop and could have raised the issue at trial or on direct appeal; in addition, the claim lacked evidentiary support showing that the laptop contained exculpatory evidence.
4. Oliger's claim that the prosecution suborned perjury was not cognizable in a Rule 37.1 proceeding because a prosecutorial-misconduct claim is a direct challenge to the conviction.

KEY QUOTATIONS

“Under Strickland, a petitioner is required to show that their trial counsel’s performance was deficient and then due to such deficiencies it prejudiced their defense.” (at 3)

“To overcome that strong presumption, the petitioner must demonstrate specific acts and omissions that—when viewed from the trial counsel’s perspective over the course of the trial—could not have been the result of “reasonable professional judgment.”” (at 3–4)

“Counsel was not ineffective for declining to seek DNA testing to connect Mathis to the folding knife.” (at 5)

“a claim of prosecutorial misconduct, including a claim of suborning perjury, is a direct challenge to the conviction and is therefore not cognizable in postconviction proceedings under Rule 37.1.” (at 7)

FACTUAL BACKGROUND

Oliger was convicted of murdering Deanna Teague, along with aggravated robbery and theft of property. The trial evidence included Oliger's statements that he stabbed Teague in the throat, his possession and use of Teague's car and credit cards, and DNA matching Oliger's DNA on Teague's hands and fingernail clippings. In

his postconviction petition, Oliger claimed that a laptop contained a recording implicating Mark Mathis, that unidentified DNA on a knife would match Mathis, and that Mathis gave false testimony about his whereabouts.

PROCEDURAL HISTORY

Oliger was convicted by a Johnson County jury of capital murder, aggravated robbery, and theft of property and received an aggregate life sentence. The Supreme Court of Arkansas affirmed his direct appeal. Oliger then filed a Rule 37.1 petition alleging ineffective assistance of counsel, a Brady violation, and prosecutorial presentation of false testimony. The Johnson County Circuit Court denied and dismissed the petition, and the Supreme Court of Arkansas affirmed.

DISPOSITION

affirmed

CASES CITED

- Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963)
- Oliger v. State, 2025 Ark. 8, 704 S.W.3d 305
- Barefield v. State, 2024 Ark. 141, 696 S.W.3d 822
- Wright v. State, 2025 Ark. 54, 709 S.W.3d 805
- Strickland v. Washington, 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984)
- Flemons v. State, 2016 Ark. 460, 505 S.W.3d 196
- Dennis v. State, 2020 Ark. 28, 592 S.W.3d 646

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