

SUPREME COURT OF OHIO

Jones v. Wainwright

2020-Ohio-4870 (Ohio 2020) · No. 2020-0452 · Decided October 15, 2020

SUMMARY

The Supreme Court of Ohio affirmed the dismissal of Anthony Jones’s habeas corpus petition challenging the Ohio Parole Board’s revocation of his parole. The court held that the claim was barred by res judicata because Jones had previously asserted the same claim, and rejected his arguments that the earlier court lacked jurisdiction or that newly obtained documents permitted relitigation.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per Curiam; Maureen O'Connor, C.J.; Sharon L. Kennedy, J.; Jennifer Brunner, J.; Pat DeWine, J.; Patrick F. Fischer, J.; Michael P. Donnelly, J.; Melody J. Stewart, J.
JURISDICTION	Ohio
DECIDED	October 15, 2020
DOCKET	2020-0452
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal as of right from the Third District Court of Appeals' dismissal of Jones's original habeas corpus petition.
STANDARD OF REVIEW	The court reviewed whether res judicata barred the habeas petition; because the defense depended only on the pleadings and Jones's concessions, the court stated that the result was appropriate whether the dismissal was under Civ.R. 12(B)(6) or Civ.R. 56.
PRECEDENTIAL VALUE	Published opinion of the Supreme Court of Ohio; precedential.
PARTIES	Anthony Jones v. Lyneal Wainwright, Warden

TOPICS

- res judicata
- state post-conviction relief
- motions to dismiss
- summary judgment
- appellate procedure

PRACTICE AREAS

- habeas corpus
- post-conviction relief
- civil procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether res judicata barred Jones's second habeas petition because he had raised or could have raised the same claim in his earlier habeas action.
2. Whether the alleged failure to attach documents required by R.C. 2725.04 and R.C. 2969.25 deprived the common pleas court of jurisdiction to adjudicate Jones's first habeas petition.
3. Whether newly relied-upon documents prevented application of res judicata when Jones had already asserted the same claim in his earlier action.
4. Whether it mattered whether the Third District dismissed the petition under Civ.R. 12(B)(6) or granted summary judgment under Civ.R. 56.

HOLDINGS

1. Res judicata barred Jones's successive habeas petition because he asserted the same claim that he had asserted in his earlier habeas action.
2. Jones did not establish that the common pleas court lacked jurisdiction to adjudicate his first habeas petition merely because he allegedly failed to attach documents required by R.C. 2725.04 and R.C. 2969.25.
3. The availability of additional evidence did not defeat res judicata because Jones could and did assert the same claim in his earlier habeas action.

KEY QUOTATIONS

“Under the doctrine of res judicata, “a final judgment or decree rendered on the merits by a court of competent jurisdiction is a complete bar to any subsequent action on the same claim between the same parties or those in privity with them.”” (¶ 6)

FACTUAL BACKGROUND

Jones pleaded guilty in 1985 to involuntary manslaughter and aggravated robbery and received an aggregate prison term of 12 to 50 years. He was released on parole in 1994 and transferred to Maryland's parole supervision in 2002, after which Ohio documents referred to closing interest in his case. In 2018, the Ohio Parole Board found that Jones had violated parole and revoked it. Jones previously litigated a habeas claim challenging the parole revocation and later filed a second petition asserting the same claim based on documents concerning the 2002 closure of Ohio's parole supervision.

PROCEDURAL HISTORY

Jones filed a 2018 habeas petition in the Marion County Court of Common Pleas, which dismissed the petition; the Third District affirmed, and the Supreme Court of Ohio denied discretionary review. Jones then filed a second habeas petition in the Third District asserting the same claim concerning the Ohio Parole Board's authority to revoke his parole. The Third District dismissed the second petition on res judicata grounds and Jones appealed to the Supreme Court of Ohio as of right.

DISPOSITION

affirmed

CASES CITED

- Jones v. Wainwright, 157 Ohio St. 3d 1440, 2019-Ohio-4211, 132 N.E.3d 701
- Jefferson v. Bunting, 140 Ohio St. 3d 62, 2014-Ohio-3074, 14 N.E.3d 1036, ¶¶ 10-12
- Brooks v. Kelly, 144 Ohio St. 3d 322, 2015-Ohio-2805, 43 N.E.3d 385, ¶¶ 7-8
- Pence v. Bunting, 143 Ohio St. 3d 532, 2015-Ohio-2026, 40 N.E.3d 1058, ¶ 6
- Russell v. Duffey, 142 Ohio St. 3d 320, 2015-Ohio-1358, 29 N.E.3d 978, ¶ 11
- Smith v. May, 159 Ohio St. 3d 106, 2020-Ohio-61, 148 N.E.3d 542, ¶ 31
- Wilson v. Eberlin, 7th Dist. Belmont No. 08 BE 9, 2008-Ohio-4320, ¶ 1
- State ex rel. Armengau v. Ohio Dept. of Rehab. & Corr., 10th Dist. Franklin No. 15AP-1070, 2017-Ohio-368, ¶¶ 3, 13

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