

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
MICHIGAN, SOUTHERN DIVISION

Christoph Riedl v. Gary Miniard

Riedl · No. 2:24-cv-10752 · Decided January 9, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan denied Christopher Riedl’s petition for a writ of habeas corpus under 28 U.S.C. § 2254. The court held that his challenge to court costs was not cognizable in federal habeas proceedings and that his claims concerning the scoring of Michigan sentencing guidelines did not establish a federal due process violation. The court also denied a certificate of appealability and leave to proceed in forma pauperis on appeal.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Michigan, Southern Division                                                                                                                                                                                                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Matthew F. Leitman                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| JURISDICTION          | United States District Court for the Eastern District of Michigan, Southern Division                                                                                                                                                                                                                                                                                                                                                                                                                     |
| DECIDED               | January 9, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| DOCKET                | 2:24-cv-10752                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | denied                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Federal habeas corpus petition under 28 U.S.C. § 2254 challenging Michigan convictions, court costs, and sentencing-guidelines scoring.                                                                                                                                                                                                                                                                                                                                                                  |
| STANDARD OF REVIEW    | Federal habeas relief under 28 U.S.C. § 2254 is available only for custody in violation of the Constitution, laws, or treaties of the United States. State-law sentencing errors are not cognizable on federal habeas review. A due-process sentencing challenge requires a sentence pronounced on materially and extensively false information that the defendant had no opportunity to correct. A certificate of appealability requires a substantial showing of the denial of a constitutional right. |
| PRECEDENTIAL VALUE    | Unpublished district court order; precedential status not stated.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| PARTIES               | Christoph Riedl v. Gary Miniard                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

TOPICS

federal habeas corpus

post-conviction relief

sentencing

due process

appellate procedure

## PRACTICE AREAS

federal habeas corpus

post-conviction relief

criminal procedure

sentencing

## QUESTIONS PRESENTED

1. Whether Riedl's challenge to Michigan-imposed court costs was cognizable in a federal habeas proceeding under 28 U.S.C. § 2254.
2. Whether alleged errors in scoring Michigan sentencing Offense Variables 10 and 4 presented cognizable federal habeas claims.
3. Whether the state trial court violated due process by sentencing Riedl on materially false or inaccurate information that he had no opportunity to correct.
4. Whether Riedl was entitled to a certificate of appealability or leave to proceed in forma pauperis on appeal.

## HOLDINGS

1. A challenge to the imposition of state court costs is not cognizable on federal habeas review because it does not challenge the fact or duration of the petitioner's confinement.
2. Alleged errors in scoring Michigan sentencing-guidelines offense variables are not cognizable on federal habeas review to the extent they present only state-law issues.
3. Riedl was not entitled to habeas relief on his due-process sentencing claim because he failed to show that the state court relied on materially false or inaccurate information that he had no opportunity to correct.
4. A certificate of appealability was denied because reasonable jurists would not debate the district court's resolution of the petition or conclude that the issues deserved encouragement to proceed further.

## KEY QUOTATIONS

*“Under § 2254, subject matter jurisdiction exists only for claims that a person is in custody in violation of the Constitution or laws or treaties of the United States.” (II.A)*

*“A state court’s alleged misinterpretation of state sentencing guidelines and crediting statutes is a matter of state concern only” (II.B)*

*“But Riedl has made no such showing here. He has not made any attempt to show how the information relied upon by the state trial court was materially false.” (II.B)*

## FACTUAL BACKGROUND

Riedl pleaded guilty to two counts of third-degree criminal sexual conduct and one count of assault with intent to commit criminal sexual conduct involving penetration in Michigan state court. He received concurrent sentences of 85 months to 15 years on the criminal sexual conduct convictions and 36 months to 10 years on the assault

conviction. He challenged the imposition of court costs and the scoring of Michigan sentencing Offense Variables 10 and 4, asserting that the costs statute was unconstitutional and that the guidelines were scored using inaccurate information.

## PROCEDURAL HISTORY

Riedl pleaded guilty in the Allegan County Circuit Court to two counts of third-degree criminal sexual conduct and one count of assault with intent to commit criminal sexual conduct involving penetration. The state court sentenced him to concurrent prison terms. The Michigan Court of Appeals denied relief, and the Michigan Supreme Court denied leave to appeal. Riedl then filed this federal habeas petition, which the district court denied, along with a certificate of appealability and leave to proceed in forma pauperis on appeal.

## DISPOSITION

denied

## CASES CITED

- People v. Riedl, 11 N.W.3d 273 (Mich. 2024)
- Washington v. McQuiggin, 529 F. App'x 766, 772-73 (6th Cir. 2013)
- Warsaw v. Palmer, 2017 WL 5201394, at \*1 (6th Cir. Apr. 19, 2017)
- Michaels v. Hackel, 491 F. App'x 670, 671 (6th Cir. 2012)
- Kennedy v. Nagy, 2018 WL 3583212, at \*2 (6th Cir. July 12, 2018)
- Estelle v. McGuire, 502 U.S. 62, 67-68 (1991)
- Howard v. White, 76 F. App'x 52, 53 (6th Cir. 2003)
- Townsend v. Burke, 334 U.S. 736, 740-41 (1948)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)