

SUPERIOR COURT OF THE STATE OF DELAWARE

State v. Anderson

State v. Anderson · No. Crim. ID No. 2310012382 · Decided December 5, 2025

SUMMARY

The Delaware Superior Court denied Michael Anderson’s motion for postconviction relief under Superior Court Criminal Rule 61. The court rejected his ineffective-assistance claims concerning indictment timing, bail reduction, suppression of evidence, dismissed charges, and alleged factual misstatements at sentencing, finding no deficient performance or prejudice.

CASE DETAILS

COURT	Superior Court of the State of Delaware
WRITING FOR THE COURT	Sean P. Lugg
JURISDICTION	Delaware Superior Court
DECIDED	December 5, 2025
DOCKET	Crim. ID No. 2310012382
DISPOSITION	denied
PROCEDURAL POSTURE	Michael Anderson sought postconviction relief under Delaware Superior Court Criminal Rule 61, alleging ineffective assistance of counsel before his guilty plea, during plea negotiations, and at sentencing. The Superior Court denied the motion.
STANDARD OF REVIEW	The court applied the Strickland v. Washington two-prong standard to Anderson's ineffective-assistance claims, requiring proof of deficient performance and a reasonable probability of prejudice. Counsel's performance was reviewed under a strong presumption of professional reasonableness, and the court could deny a claim for failure to establish prejudice alone.
PRECEDENTIAL VALUE	Published Delaware Superior Court memorandum opinion; precedential status is identified as published in the supplied metadata.
PARTIES	State of Delaware v. Michael Anderson

TOPICS

- post-conviction relief
- ineffective assistance
- plea bargaining
- sentencing
- criminal procedure

PRACTICE AREAS

criminal procedure

post-conviction relief

ineffective assistance of counsel

plea bargaining

sentencing

QUESTIONS PRESENTED

1. Whether Anderson's ineffective-assistance claim based on counsel's failure to move to dismiss or reduce bail for delayed indictment was barred or meritorious under Strickland.
2. Whether counsel was ineffective for failing to seek a continuance and file a motion to suppress evidence allegedly seized in violation of the Fourth Amendment.
3. Whether counsel was ineffective for failing to challenge a charge involving cocaine found in the police vehicle when that charge was dismissed as part of the plea agreement.
4. Whether counsel was ineffective for failing to object to the prosecutor's misstatement at sentencing concerning the number of drug transactions.

HOLDINGS

1. The motion was timely, and none of Delaware Superior Court Criminal Rule 61's procedural bars prevented consideration of Anderson's ineffective-assistance claims. However, claims concerning alleged errors occurring before entry of a knowing, intelligent, and voluntary guilty plea were waived.
2. Counsel was not ineffective for failing to move to dismiss based on the timing of the indictment, and Anderson failed to establish either deficient performance or prejudice. Counsel had in fact filed a motion to reduce bail, which was unsuccessful.
3. Counsel was not ineffective for failing to file a motion to suppress because Anderson identified no legal or factual basis for suppression and failed to substantiate either deficient performance or prejudice.
4. Counsel was not ineffective for failing to challenge the charge involving cocaine found in the police vehicle because Anderson pleaded guilty, the charge was dismissed as part of the negotiated plea, counsel secured a favorable resolution, and Anderson did not show that he would have rejected the plea and proceeded to trial.
5. Counsel was not ineffective for failing to object to the prosecutor's inaccurate statement that Anderson had engaged in eight drug transactions because the sentencing judge did not rely on the misstatement and Anderson suffered no prejudice.

KEY QUOTATIONS

“Superior Court Criminal Rule 61 provides the exclusive remedy for setting aside a final judgment of conviction.” (8)

“The Rule is “intended to correct errors in the trial process, not to allow defendants unlimited opportunities to relitigate their convictions.”” (8)

“Under Strickland, a defendant must show (1) “that counsel’s representation fell below an objective standard of reasonableness;”⁵⁶ and (2) “that there is a reasonable probability that, but for counsel’s unprofessional errors, the result of the proceeding would have been different.”” (9)

“Rhodunda’s informed decision not to seek suppression and to focus on securing the best possible resolution for Anderson was professionally reasonable.” (13)

FACTUAL BACKGROUND

Delaware State Police conducted six controlled drug purchases from Anderson between August and October 2023, involving cocaine and heroin or fentanyl. Anderson was arrested on January 29, 2024, and police found approximately 33.8 grams of cocaine in the police vehicle seat where he had been sitting. He pleaded guilty to four cocaine-dealing counts in exchange for dismissal of other charges and a cap on the State’s sentencing recommendation; the court later imposed thirty years suspended after five years. Anderson alleged that counsel was ineffective for failing to challenge the indictment timing, seek suppression, challenge a dismissed charge, and object to a prosecutor’s sentencing misstatement.

PROCEDURAL HISTORY

Anderson was indicted on drug-dealing charges, pleaded guilty to four counts of dealing cocaine, and received an aggregate sentence of thirty years of incarceration, suspended after five years subject to probationary supervision. He did not appeal. The court denied his later motions for sentence modification and correction of an illegal sentence. Anderson then filed a Rule 61 motion, which the court considered on the merits after finding it timely and not barred by Rule 61’s procedural bars.

DISPOSITION

denied

CASES CITED

- Jackson v. State, 2007 WL 2231072, at *1 (Del. Aug. 2, 2007)
- Ploof v. State, 75 A.3d 811, 820 (Del. 2013)
- Kellam v. State, 341 A.3d 475, 489 (Del. 2025)
- Dollard v. State, 2020 WL 2393353, at *2 (Del. May 11, 2020)
- Miller v. State, 840 A.2d 1229, 1232 (Del. 2003)
- Strickland v. Washington, 466 U.S. 668, 687-88, 693-94, 697 (1984)
- Dawson v. State, 673 A.2d 1186, 1196 (Del. 1996)
- Harrington v. Richter, 562 U.S. 86, 104 (2011)
- State v. Reyes, 155 A.3d 331, 343 (Del. 2017)
- Swan v. State, 28 A.3d 362, 384 (Del. 2011)
- State v. Wright, 2023 WL 2128338, at *3 (Del. Super. Ct. Feb. 21, 2023)
- Younger v. State, 580 A.2d 553, 556 (Del. 1990)
- State v. Miller, 2006 WL 3404644, at *3 (Del. Super. Ct. Nov. 20, 2006)
- State v. Moore, 2024 WL 2292230, at *4 (Del. Super. Ct. May 21, 2024)
- State v. Ryle, 2019 WL 2714817, at *7 (Del. Super. Ct. June 27, 2019)

- Lafler v. Cooper, 566 U.S. 156 (2012)
- Bradley v. State, 2007 WL 1599991, at *1 (Del. June 5, 2007)
- Hill v. Lockhart, 474 U.S. 52, 58 (1985)
- Taylor v. State, 28 A.3d 399, 406 (Del. 2011)
- Jones v. Barnes, 463 U.S. 745, 751 (1983)
- Ayers v. State, 2002 WL 1836600, at *1 (Del. Aug. 9, 2002)
- Lawhorn v. State, 2016 WL 6649222, at *3 (Del. Nov. 9, 2016)
- Cooke v. State, 338 A.3d 418, 455 (Del. 2025)

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