

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, ALEXANDRIA DIVISION

Myison Iaeene Ellis v. Chadwick Dotson

No. 1:25-cv-866 (PTG/WEF) · No. 1:25-cv-866 (PTG/WEF) · Decided March 30, 2026

SUMMARY

This Memorandum Opinion addresses Myison Iaeene Ellis’s petition for a writ of habeas corpus under 28 U.S.C. § 2254 challenging Virginia convictions for first-degree murder, conspiracy to commit robbery, and use or display of a firearm in the commission of a felony. The court grants the respondent’s motion to dismiss Claims 1 through 5 with prejudice, denies the motion without prejudice as to Claim 6, and orders a supplemental response addressing that claim. The opinion applies the exhaustion and procedural-default principles governing federal habeas review and the deferential AEDPA and Strickland standards.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Alexandria Division
WRITING FOR THE COURT	Patricia Tolliver Giles
JURISDICTION	United States District Court for the Eastern District of Virginia, Alexandria Division
DECIDED	March 30, 2026
DOCKET	1:25-cv-866 (PTG/WEF)
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254 from Virginia convictions. Respondent moved to dismiss Claims 1 through 5 but did not address Claim 6.
STANDARD OF REVIEW	Under AEDPA, relief was unavailable unless the state-court decision was contrary to or involved an unreasonable application of clearly established Supreme Court law, or was based on an unreasonable factual determination. State factual findings were presumed correct absent clear and convincing evidence. Ineffective-assistance claims were reviewed under the doubly deferential Strickland and AEDPA standards.

PRECEDENTIAL VALUE	Unpublished federal district court memorandum opinion; generally nonprecedential.
PARTIES	Myison Iaeene Ellis v. Chadwick Dotson

TOPICS

federal habeas corpus post-conviction relief ineffective assistance sixth amendment criminal procedure

PRACTICE AREAS

federal habeas corpus post-conviction relief criminal procedure constitutional law

QUESTIONS PRESENTED

1. Whether the state court reasonably rejected Ellis's ineffective-assistance claim based on counsel's failure to provide notice of intended DNA evidence.
2. Whether the state court reasonably rejected Ellis's ineffective-assistance claim concerning impeachment of Lucretia Robinson with criminal history and prior interview transcripts.
3. Whether the state court reasonably rejected Ellis's ineffective-assistance claim based on counsel's failure to investigate and subpoena Mable Lanham.
4. Whether the state court reasonably rejected Ellis's ineffective-assistance claim concerning alleged inconsistencies in Karen Farmer's testimony.
5. Whether the state court reasonably rejected Ellis's ineffective-assistance claim based on counsel's failure to object to limitations on cross-examination of Karen Farmer.
6. Whether Respondent had established grounds to dismiss Ellis's Sixth Amendment Confrontation Clause claim concerning limitations on impeachment of Karen Farmer.

HOLDINGS

1. The state court's rejection of Ellis's ineffective-assistance claims was reasonable under the doubly deferential AEDPA and Strickland standards; Claims 1 through 5 were dismissed with prejudice.
2. The state court reasonably rejected the claim that trial counsel was ineffective for failing to provide twenty-one-day notice of intended DNA evidence.
3. The state court reasonably rejected Ellis's claims challenging counsel's decisions about impeachment, interview transcripts, criminal history, a rebuttal witness, and alleged inconsistencies in testimony.
4. The state court reasonably rejected Ellis's ineffective-assistance claim concerning counsel's failure to object to the trial court's treatment of Farmer as a nonadverse witness.
5. The motion to dismiss was denied without prejudice as to Claim 6 because Respondent had not addressed that claim; Respondent was ordered to file a supplemental response.

KEY QUOTATIONS

“Under the Antiterrorism Effective Death Penalty Act of 1996 (“AEDPA”), “a federal court may not grant a state prisoner’s habeas application unless the relevant state-court decision ‘was contrary to, or involved an unreasonable application of, clearly established Federal law, as determined by the Supreme Court of the United States.’” (4)

“The United States Supreme Court has characterized “a Strickland claim evaluated under the § 2254(d)(1) standard” as “doubly deferential judicial review.”” (5)

FACTUAL BACKGROUND

Ellis was convicted after a three-day Virginia trial of first-degree murder, conspiracy to commit robbery, and use or display of a firearm in the commission of a felony. His defense included an alibi and challenges to the testimony of Karen Farmer and Lucretia Robinson, including alleged failures to present or use DNA evidence, prior statements, criminal history, and a proposed rebuttal witness. The state habeas court rejected his ineffective-assistance claims, finding counsel's performance reasonable and, in some instances, finding inadequate factual support or procedural default.

PROCEDURAL HISTORY

Ellis was convicted in the Circuit Court of Fauquier County, Virginia, of first-degree murder, conspiracy to commit robbery, and use or display of a firearm in the commission of a felony, and received a fifty-one-year sentence. The Virginia Court of Appeals affirmed, and the Supreme Court of Virginia refused further review. Ellis's state habeas petition was denied under Strickland and related procedural grounds. In this federal habeas proceeding, the court granted the motion to dismiss Claims 1 through 5 with prejudice, denied the motion without prejudice as to Claim 6, and ordered a supplemental response addressing Claim 6.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand to a lower court. Respondent was directed to file a supplemental response addressing Claim 6.

CASES CITED

- Roseboro v. Garrison, 528 F.2d 309 (4th Cir. 1975)
- Baker v. Corcoran, 220 F.3d 276, 288 (4th Cir. 2000)
- Vasquez v. Hillery, 474 U.S. 254, 257 (1986)
- Castille v. Peoples, 489 U.S. 346, 350-51 (1989)
- Duncan v. Henry, 513 U.S. 364, 365-66 (1995)
- Kasi v. Angelone, 300 F.3d 487, 501-02 (4th Cir. 2002)
- Breard v. Pruett, 134 F.3d 615, 619 (4th Cir. 1998)
- Knowles v. Mirzayance, 556 U.S. 111, 121, 123 (2009)

- Burt v. Titlow, 571 U.S. 12, 20 (2013)
- Cullen v. Pinholster, 563 U.S. 170, 181, 188 (2011)
- Schriro v. Landrigan, 550 U.S. 465, 473-74 (2007)
- Renico v. Lett, 559 U.S. 766, 772-73 (2010)
- White v. Woodall, 572 U.S. 415, 419 (2014)
- Lockyer v. Andrade, 538 U.S. 63, 75-76 (2003)
- Harrington v. Richter, 562 U.S. 86, 103 (2011)
- Lenz v. Washington, 444 F.3d 295, 299 (4th Cir. 2006)
- Green v. Johnson, 515 F.3d 290, 299 (4th Cir. 2008)
- Strickland v. Washington, 466 U.S. 668, 687, 689, 694 (1984)
- United States v. Mason, 774 F.3d 824, 828 (4th Cir. 2014)
- Valentino v. Clarke, 972 F.3d 560, 580 (4th Cir. 2020)
- Mays v. Hines, 592 U.S. 385, 392 (2021)
- Woods v. Etherton, 578 U.S. 113, 117 (2016)
- Crockett v. Clarke, 35 F.4th 231, 242 (4th Cir. 2022)
- Owens v. Stirling, 967 F.3d 396, 411 (4th Cir. 2020)
- Morva v. Zook, 821 F.3d 517, 528 (4th Cir. 2016)
- Commonwealth v. Dalton, 524 S.E.2d 860, 862 (Va. 2000)
- Sallie v. North Carolina, 587 F.2d 636, 640 (4th Cir. 1978)
- Slayton v. Parrigan, 215 Va. 27, 29-30, 205 S.E.2d 680, 682 (1974)
- Chambers v. Mississippi, 410 U.S. 284 (1973)