

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Collin Zachary LaFreniere v. Chadwick Dotson

LaFreniere v. Dotson · No. 3:25-cv-189-HEH · Decided December 1, 2025

SUMMARY

The United States District Court for the Eastern District of Virginia grants the respondent’s motion to dismiss a 28 U.S.C. § 2254 habeas petition filed by Collin Zachary LaFreniere. The court rejects his ineffective-assistance claim concerning counsel’s failure to ensure enforcement of a jail hold order and to seek reconsideration of his sentence, concluding that he failed to establish prejudice under Strickland v. Washington. The petition is denied, the action is dismissed, and a certificate of appealability is denied.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia
WRITING FOR THE COURT	Henry E. Hudson
JURISDICTION	United States District Court for the Eastern District of Virginia
DECIDED	December 1, 2025
DOCKET	3:25-cv-189-HEH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal habeas petition under 28 U.S.C. § 2254 challenging a state habeas court's rejection of an ineffective-assistance-of-counsel claim. The respondent moved to dismiss, and the district court granted the motion, denied the petition, dismissed the action, and denied a certificate of appealability.
STANDARD OF REVIEW	Under 28 U.S.C. § 2254(d), federal habeas relief is unavailable for a claim adjudicated on the merits in state court unless the state decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court precedent, or was based on an unreasonable determination of the facts. State factual determinations are presumed correct under 28 U.S.C. § 2254(e)(1). Ineffective-assistance claims are governed by Strickland v. Washington and require deficient performance and resulting prejudice; a court may resolve the claim solely on the prejudice prong.

PRECEDENTIAL VALUE	Unknown; memorandum opinion with no reporter citation.
PARTIES	Collin Zachary LaFreniere v. Chadwick Dotson

TOPICS

federal habeas corpus post-conviction relief ineffective assistance sentencing right to counsel

PRACTICE AREAS

federal habeas corpus criminal procedure post-conviction relief ineffective assistance sentencing

QUESTIONS PRESENTED

1. Whether the state habeas court unreasonably applied *Strickland v. Washington* or unreasonably determined the facts in rejecting LaFreniere's ineffective-assistance claim.
2. Whether counsel's alleged failure to enforce the local-jail hold order or seek sentence reconsideration prejudiced LaFreniere.

HOLDINGS

1. Federal habeas relief was unavailable because the state habeas court's rejection of the claim did not involve an unreasonable application of clearly established federal law or an unreasonable determination of the facts.
2. LaFreniere failed to demonstrate a reasonable probability that counsel's alleged failures affected the outcome of the sentence or post-trial proceedings.

KEY QUOTATIONS

"The likelihood of a different result must be substantial, not just conceivable." (at 11)

"Given these circumstances, Petitioner fails to demonstrate prejudice." (at 12)

FACTUAL BACKGROUND

LaFreniere was convicted after a bench trial of offenses arising from two robberies of Ahmed Elborolosi, including a Fredericksburg robbery involving Elborolosi's cell phone, and received ten years of active imprisonment, including mandatory firearm sentences. After LaFreniere's codefendant obtained a favorable plea agreement following a mistrial, LaFreniere's counsel obtained an order directing that LaFreniere remain in the local jail, but LaFreniere was transferred to the Virginia Department of Corrections before the codefendant entered the plea. LaFreniere claimed counsel was ineffective for failing to ensure the hold order was provided to the jail and for failing to seek sentence reconsideration within sixty days after the transfer.

PROCEDURAL HISTORY

After a bench trial in the Circuit Court for the City of Fredericksburg, Petitioner was convicted of robbery, use of a firearm in the commission of robbery, conspiracy to commit robbery, abduction, and use of a firearm in the

commission of abduction, and received a ten-year active sentence. The Court of Appeals of Virginia rejected his sufficiency-of-the-evidence challenges, and the Supreme Court of Virginia thereafter denied relief. Petitioner then filed a state habeas petition alleging ineffective assistance based on counsel's failure to ensure enforcement of a local-jail hold order and failure to seek sentence reconsideration within the statutory period; the state habeas court denied the claim, and the Supreme Court of Virginia refused his petition for appeal. The federal district court granted Respondent's motion to dismiss.

DISPOSITION

dismissed

CASES CITED

- Gray v. Branker, 529 F.3d 220, 228 (4th Cir. 2008)
- Schiro v. Landrigan, 550 U.S. 465, 473 (2007)
- Williams v. Taylor, 529 U.S. 362, 410 (2000)
- Strickland v. Washington, 466 U.S. 668, 687, 689, 694, 697 (1984)
- Burch v. Corcoran, 273 F.3d 577, 588 (4th Cir. 2001)
- Harrington v. Richter, 562 U.S. 86, 111-12 (2011)
- Waters v. Commonwealth, 29 Va. App. 133, 139 (1999)
- McMorris v. Commonwealth, 276 Va. 500, 505 (2008)
- Carter v. Commonwealth, 232 Va. 122, 126-27 (1986)
- Clanton v. Commonwealth, 53 Va. App. 561, 567 (2009)
- Walker v. Commonwealth, 47 Va. App. 114, 120 (2005)
- Haskell v. Commonwealth, 218 Va. 1033, 1043 (1978)