

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

Ronald Northcraft v. Chadwick Dotson

Northcraft · No. 3:25CV853 (RCY) · Decided May 4, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia dismissed Ronald Northcraft’s 28 U.S.C. § 2254 petition for lack of jurisdiction because he was no longer in custody under the challenged convictions when he filed it. The court granted the respondent’s motion to dismiss, denied the petitioner’s motion to transfer venue and opposition to dismissal, and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Roderick C. Young
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	May 4, 2026
DOCKET	3:25CV853 (RCY)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254. Respondent moved to dismiss for lack of jurisdiction because Petitioner was not in custody when he filed the petition.
STANDARD OF REVIEW	The court applied the jurisdictional in-custody requirement under 28 U.S.C. § 2254(a), determining whether Petitioner was in custody under the challenged conviction or sentence when the petition was filed.
PRECEDENTIAL VALUE	Unpublished memorandum opinion; precedential status unknown.

TOPICS

- federal habeas corpus
- post-conviction relief
- motions to dismiss
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court had jurisdiction under 28 U.S.C. § 2254 when Petitioner was no longer in custody under the challenged convictions or sentences at the time he filed the petition.

HOLDINGS

1. A petitioner must be in custody under the conviction or sentence being challenged when a § 2254 petition is filed. Because Petitioner had completed both his incarceration and post-release supervision before filing, he was not in custody and the district court lacked jurisdiction.

KEY QUOTATIONS

“The Supreme Court has “interpreted the statutory language as requiring that the habeas petitioner be ‘in custody’ under the conviction or sentence under attack at the time his petition is filed.”” (Analysis)

“Because Petitioner was not in custody pursuant to the convictions he seeks to challenge at the time he filed the § 2254 Petition, the action will be DISMISSED for lack of jurisdiction.” (Analysis)

FACTUAL BACKGROUND

Petitioner, a former Virginia state prisoner, challenged convictions for grand larceny of motor vehicles, unlawfully obtaining DMV documents, making false statements on title applications, money laundering, and attempted money laundering. He completed his active incarceration on July 1, 2024, and his six-month period of post-release supervision on January 1, 2025. He filed his federal habeas petition on October 15, 2025, after both forms of custody had ended.

PROCEDURAL HISTORY

A Virginia jury convicted Petitioner of multiple larceny, DMV-document, false-statement, and money-laundering offenses. The Circuit Court for the City of Richmond imposed a total sentence of two years and eighteen months and six months of post-release supervision. Petitioner completed incarceration on July 1, 2024, completed post-release supervision on January 1, 2025, and filed the § 2254 petition on October 15, 2025. The district court granted Respondent's motion to dismiss, denied Petitioner's motion to transfer venue and opposition motion, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- *Maleng v. Cook*, 490 U.S. 488, 490-91 (1989)
- *Carafas v. LaVallee*, 391 U.S. 234, 238 (1968)

OPINION

Northcraft

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

RONALD NORTHCRAFT,

Petitioner, v. Civil Action No. 3:25CV853 (RCY)

CHADWICK DOTSON,

Respondent.

MEMORANDUM OPINION

Petitioner, a former Virginia state prisoner proceeding pro se, brings this petition pursuant to 28 U.S.C. § 2254 (“§ 2254 Petition”) challenging his convictions imposed by the Circuit Court for the City of Richmond. Respondent has moved to dismiss on the grounds that Petitioner was not in custody at the time he filed the § 2254 Petition. Petitioner has responded.¹ For the reasons set forth below, the Motion to Dismiss (ECF No. 6) will be GRANTED.

I. PROCEDURAL HISTORY

A jury convicted Petitioner of three counts of grand larceny of a motor vehicle, in violation of Code § 18.2-95, five counts of unlawfully obtaining documents from the Department of Motor Vehicles (“DMV”), in violation of Code § 46.2-105.2(A), five counts of making a false statement on an application for a certificate of title, in violation of Code § 46.2-605, one count of money laundering, in violation of Code § 18.2-246.3(A), and one count of attempted money laundering, in violation of Code §§ 18.2-26, 246.3(A). ¹ The Court employs the pagination assigned by the CM/ECF docketing system. The Court corrects the capitalization, punctuation, and spelling in the quotations from the parties’ submissions. ECF No. 8-2, at 1. On September 20, 2021, the Circuit Court imposed a total sentence of 2 years and 18 months. ECF No. 8-1, at 2. Additionally, the Circuit Court imposed a six-month period of post-release supervision. /d. at 3. Petitioner “fully satisfied his active term of incarceration and was released from [Virginia Department of Corrections’ custody on July 1, 2024. ECF No. 8-5, at 2. Petitioner successfully completed his period of post-release supervision on January 1, 2025. Id. Petitioner filed his § 2254 Petition on October 15, 2025. ECF No. 1, at 1.

II. ANALYSIS

To qualify for relief under 28 U.S.C. § 2254, a petitioner must be in custody. See 28 U.S.C. § 2254(a). The Supreme Court has “interpreted the statutory language as requiring that the habeas petitioner be ‘in custody’ under the conviction or sentence under attack at the time his petition is filed.” *Maleng v. Cook*, 490 U.S. 488, 490-91 (1989) (citing *Carafas v. LaVallee*, 391 U.S. 234, 238 (1968)). The in-custody requirement is jurisdictional. /d. at 490. Because Petitioner was not in custody pursuant to the convictions he seeks to challenge at the time he filed the § 2254 Petition,

the action will be DISMISSED for lack of jurisdiction. Ill. CONCLUSION The Motion to Dismiss (ECF No. 6) will be GRANTED. Petitioner's Motion to Transfer Venue (ECF No. 5) will be DENIED. Petitioner's Motion in Opposition to the Motion to Dismiss (ECF No. 14) will be DENIED. The action will be DISMISSED for lack of jurisdiction. A certificate of appealability will be DENIED. An appropriate Final Order shall issue. Roderick C. Young Date: May 4, 2026
United States District Judge Richmond, Virginia