

INDIANA SUPREME COURT

Jada Sha'nel Monroe v. State of Indiana

No. 26S-CR-208 (Ind. June 29, 2026) · No. 26S-CR-208 · Decided June 29, 2026

SUMMARY

The Indiana Supreme Court holds that a defendant who pleads guilty generally may not challenge the resulting convictions on direct appeal, including on double-jeopardy grounds. The court explains that a defendant who did not agree through a plea agreement to a lesser-included conviction may instead move to withdraw the guilty plea as to that conviction and seek its vacation, then directly appeal the denial of that motion. Because Jada Monroe did not pursue that procedure, the court summarily affirmed the Court of Appeals’ decision.

CASE DETAILS

COURT	Indiana Supreme Court
WRITING FOR THE COURT	Justice Molter; Chief Justice Rush; Justice Massa; Justice Slaughter; Justice Goff
JURISDICTION	Indiana Supreme Court
DECIDED	June 29, 2026
DOCKET	26S-CR-208
DISPOSITION	affirmed
PROCEDURAL POSTURE	Monroe pleaded guilty to murder, felony murder, and robbery resulting in serious bodily injury. After the trial court entered judgment on the murder and robbery convictions but not the felony-murder conviction, Monroe directly appealed, arguing that the robbery conviction also violated double-jeopardy principles. The Indiana Court of Appeals affirmed. The Indiana Supreme Court granted transfer, vacated the Court of Appeals opinion, and summarily affirmed the Court of Appeals' remaining rulings.
STANDARD OF REVIEW	Whether a defendant may directly appeal a conviction following a guilty plea is a purely legal question reviewed de novo. A trial court's denial of a motion to withdraw a guilty plea is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	published; reliance barred until certification under Indiana Appellate Rule 65(E)

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether a defendant who pleads guilty without a plea agreement may directly appeal a conviction on double-jeopardy grounds.
2. Whether a defendant may obtain direct appellate review of an allegedly improper lesser-included conviction by moving to withdraw the guilty plea as to that offense and appealing the denial of that motion.
3. Whether Monroe's direct appeal was available when she did not move to withdraw her guilty plea as to the robbery conviction.

HOLDINGS

1. A defendant who pleads guilty generally may not challenge the validity of the resulting convictions through a direct appeal; the claim must ordinarily be pursued through post-conviction relief. The court declined to create an exception for defendants who plead guilty without a plea agreement.
2. When a trial court enters judgment on a lesser-included offense after a guilty plea, and the defendant did not agree through a plea agreement that the conviction would be entered or sentenced, the defendant should move to withdraw the guilty plea as to only the lesser-included offense and ask the trial court to vacate only that conviction.
3. An appellate court reviews denial of a motion to withdraw a guilty plea for abuse of discretion. If the challenged conviction violates double jeopardy, denial of the motion constitutes an abuse of discretion; if no violation exists, there is no abuse of discretion.

KEY QUOTATIONS

“When a defendant pleads guilty, they cannot challenge their conviction through a direct appeal; they must instead pursue post-conviction relief.” (1)

“Thus, when a trial court mistakenly enters rather than vacates a judgment of conviction on a lesser included offense following a guilty plea, and the defendant did not agree to that through a plea agreement establishing which convictions would be entered or subject to sentencing, the defendant should move to withdraw the guilty plea.” (4)

“In this case, Monroe did not file a motion to withdraw the guilty plea as to a lesser included conviction. A direct appeal is therefore unavailable, and any remedy must come through post-conviction relief.” (6)

FACTUAL BACKGROUND

The State charged Monroe with murder, felony murder committed during a robbery, and robbery resulting in serious bodily injury. Monroe pleaded guilty to all three counts without a plea agreement, and the parties agreed that the felony-murder count should be merged or vacated as an included offense of murder. At sentencing, Monroe argued that the robbery conviction should also be vacated on double-jeopardy grounds, but the trial court entered judgment on the murder and robbery convictions only.

PROCEDURAL HISTORY

The Porter Superior Court accepted Monroe's guilty pleas and entered judgment of conviction on murder and robbery resulting in serious bodily injury, while not entering judgment on felony murder. Monroe appealed the robbery conviction on double-jeopardy grounds, but the Court of Appeals held that a defendant who pleads guilty cannot challenge the validity of the conviction on direct appeal. The Indiana Supreme Court granted transfer and held that Monroe's failure to move to withdraw her guilty plea as to the allegedly lesser-included offense made direct appellate review unavailable.

DISPOSITION

affirmed

CASES CITED

- Tumulty v. State, 666 N.E.2d 394 (Ind. 1996)
- Mayo v. State, 681 N.E.2d 689, 695 (Ind. 1997) (Shepard, C.J., concurring)
- Hayes v. State, 906 N.E.2d 819, 821 (Ind. 2009)
- Mapp v. State, 770 N.E.2d 332, 333-35 (Ind. 2002)
- Crider v. State, 984 N.E.2d 618, 625 (Ind. 2013)
- Brightman v. State, 758 N.E.2d 41, 44 (Ind. 2001)
- A.W. v. State, 229 N.E.3d 1060, 1073 (Ind. 2024)
- Coomer v. State, 652 N.E.2d 60, 61-62 (Ind. 1995)
- Johnson v. State, 734 N.E.2d 242, 245 (Ind. 2000)
- Expert Pool Builders, LLC v. Vangundy, 224 N.E.3d 309, 312 (Ind. 2024)
- McDonald v. State, 179 N.E.3d 463, 464 (Ind. 2022) (per curiam)
- Helvie v. State, 248 N.E.3d 615, 616-17 (Ind. Ct. App. 2024), transfer denied
- Newsome v. State, 797 N.E.2d 293, 297 (Ind. Ct. App. 2003), transfer denied
- Davis v. State, 217 N.E.3d 1229, 1233-34 (Ind. 2023), as modified (Oct. 3, 2023)
- McElroy v. State, 864 N.E.2d 392, 396 (Ind. Ct. App. 2007), transfer denied
- Snyder v. State, 176 N.E.3d 995, 999-1000 (Ind. Ct. App. 2021)
- Kunberger v. State, 46 N.E.3d 966, 971 (Ind. Ct. App. 2015)
- Thompson v. State, 82 N.E.3d 376, 379-80 (Ind. Ct. App. 2017), transfer denied
- Kincaid v. State, 778 N.E.2d 789, 790-92 (Ind. 2002)

- Anderson v. State, 269 N.E.3d 817, 820-23 (Ind. 2025)
- State ex rel. Goldsmith v. Marion County Superior Court, 419 N.E.2d 109, 114 (Ind. 1981)
- Creech v. State, 887 N.E.2d 73, 75 (Ind. 2008)
- Games v. State, 743 N.E.2d 1132, 1134-35 (Ind. 2001)
- Sholes v. State, 878 N.E.2d 1232, 1235 (Ind. 2008)
- Mills v. State, 868 N.E.2d 446, 452-53 (Ind. 2007)
- Witt v. State, 867 N.E.2d 1279, 1280 n.8 (Ind. 2007)
- Weatherford v. State, 697 N.E.2d 32, 33-34 n.4 (Ind. 1998)
- Butler v. State, 658 N.E.2d 72, 76-77 (Ind. 1995)
- Idle v. State, 587 N.E.2d 712, 715 (Ind. Ct. App. 1992), transfer denied
- DeWees v. State, 180 N.E.3d 261, 265 (Ind. 2022)
- Gober v. State, 163 N.E.3d 347, 352, 357 (Ind. Ct. App. 2021), transfer denied
- Yost v. State, 150 N.E.3d 610, 612, 615 (Ind. Ct. App. 2020)
- United States v. Broce, 488 U.S. 563, 569, 575-76 (1989)
- Menna v. New York, 423 U.S. 61, 62-63 & n.2 (1975)
- Class v. United States, 583 U.S. 174, 181 (2018)
- Griffin v. State, 540 N.E.2d 1187, 1188 (Ind. 1989)
- Jordan v. State, 676 N.E.2d 352, 354 (Ind. Ct. App. 1997)
- Wadle v. State, 151 N.E.3d 227, 249, 253 (Ind. 2020)
- United States v. Melancon, 972 F.2d 566, 571-72 (5th Cir. 1992) (Parker, J., concurring)
- United States v. Raynor, 989 F. Supp. 43, 44 (D.D.C. 1997), abrogation recognized by United States v. Powers, 885 F.3d 728, 732-33 (D.C. Cir. 2018)
- Wihebrink v. State, 192 N.E.3d 167, 168 (Ind. 2022) (David, J., dissenting from denial of transfer)
- Pennsylvania v. Finley, 481 U.S. 551 (1987)