

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION AT CINCINNATI

Griffin v. Warden, Chillicothe Correctional Institution

Case No. 1:25-cv-793 (S.D. Ohio Feb. 17, 2026) · No. 1:25-cv-793 · Decided February 17, 2026

SUMMARY

The United States District Court for the Southern District of Ohio denied Michael Griffin’s pro se motion to expand the record in his habeas corpus case. The court held that the requested Amazon purchase-history exhibit was part of the state-court record but was not necessary to decide Griffin’s claim that his conviction rested on legally insufficient evidence.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
WRITING FOR THE COURT	Michael R. Merz; District Judge Jeffery P. Hopkins; Magistrate Judge Michael R. Merz
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
DECIDED	February 17, 2026
DOCKET	1:25-cv-793
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought to expand the state-court record in his federal 28 U.S.C. § 2254 habeas proceeding by adding a trial exhibit concerning Amazon purchase history.
STANDARD OF REVIEW	Whether expansion of the habeas record was necessary under Rule 7 of the Rules Governing § 2254 Cases and permissible under Cullen v. Pinholster.
PRECEDENTIAL VALUE	unpublished
PARTIES	Michael Griffin v. Warden, Chillicothe Correctional Institution

TOPICS

- federal habeas corpus
- post-conviction relief
- evidence
- due process
- civil procedure

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Civil procedure

QUESTIONS PRESENTED

1. Whether the federal habeas court should expand the record under Rule 7 of the Rules Governing § 2254 Cases to include State's Exhibit 7J.
2. Whether Cullen v. Pinholster precluded consideration of the exhibit because it was not included in the state-court record filed in the federal proceeding.

HOLDINGS

1. Pinholster did not preclude adding the exhibit because it was part of the trial record and was seen or available to be seen by the Ohio Twelfth District Court of Appeals on direct appeal; adding it would not constitute admitting new evidence to assess the reasonableness of the state court's constitutional analysis.
2. The motion to expand the record was denied because the court did not need State's Exhibit 7J to properly decide Griffin's federal habeas claim.

KEY QUOTATIONS

"The determinative question is whether the Court needs the document to properly decide the case."

"Petitioner's Motion to Expand the Record is DENIED."

FACTUAL BACKGROUND

Griffin's federal habeas petition included a claim that his conviction rested on legally insufficient evidence, including allegedly conjectural testimony by a detective concerning an Amazon business record. He sought to add State's Exhibit 7J, an authenticated Amazon purchase history that had been admitted at trial and was available to the state appellate court on direct appeal. The Warden did not challenge the exhibit's authenticity but argued that it was unnecessary to adjudicate the habeas claim.

PROCEDURAL HISTORY

Griffin challenged his state conviction in federal habeas proceedings, asserting that his due process rights were violated by the use of legally insufficient evidence. The Ohio Twelfth District Court of Appeals rejected that claim and affirmed his conviction. In the federal proceeding, Griffin moved under Rule 7 of the Rules Governing § 2254 Cases to add State's Exhibit 7J; the district court denied the motion.

DISPOSITION

other

CASES CITED

- Cullen v. Pinholster, 563 U.S. 170 (2011)
- Upshaw v. Stephenson, 97 F. 4th 365, 372 (6th Cir. 2024)
- Mitchell v. Genovese, 974 F.3d 638, 647 (6th Cir. 2020)
- State v. Griffin, 2025-Ohio-1403 (Ohio App. 12th Dist., Apr. 21, 2025)

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