

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Stevens v. Morrison

No. 3:19-CV-11069 (E.D. Mich. Dec. 18, 2025) · No. No. 3:19-CV-11069 · Decided December 22, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan denies Randy Scott Stevens’s petition for a writ of habeas corpus under 28 U.S.C. § 2254. The opinion addresses claims involving evidentiary rulings, ineffective assistance of trial and appellate counsel, prosecutorial misconduct, Brady violations, newly discovered evidence, and other alleged constitutional errors. The court also declines to issue a certificate of appealability but grants leave to appeal in forma pauperis.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Gershwin A. Drain
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	December 22, 2025
DOCKET	No. 3:19-CV-11069
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2254 challenging Michigan convictions for first- and second-degree criminal sexual conduct and aiding and abetting.
STANDARD OF REVIEW	Under AEDPA, relief is available only when the state-court adjudication was contrary to, or involved an unreasonable application of, clearly established Supreme Court law, or was based on an unreasonable determination of the facts. Sufficiency-of-the-evidence claims are reviewed under Jackson v. Virginia and may be granted only when the state court's determination falls below the threshold of bare rationality. Claims of prosecutorial misconduct and evidentiary error receive deferential habeas review.
PARTIES	Randy Scott Stevens v. Bryan Morrison

QUESTIONS PRESENTED

1. Whether the admission of prior-acts, hearsay, opinion, and other evidence violated Michigan law or federal due process.
2. Whether trial or appellate counsel provided ineffective assistance.
3. Whether prosecutorial misconduct, including alleged denigration of a witness, presentation of perjured testimony, transcript delays, and suppression of evidence, denied Stevens a fair trial.
4. Whether restrictions on cross-examination and admission of co-defendant statements violated the Sixth Amendment Confrontation Clause.
5. Whether sufficient evidence supported Stevens's convictions for aiding and abetting criminal sexual conduct.
6. Whether the prosecution violated Brady by suppressing exculpatory or impeachment evidence.
7. Whether cumulative error warranted habeas relief.
8. Whether newly discovered evidence established actual innocence.
9. Whether alleged errors in state post-conviction proceedings were cognizable in federal habeas review.

HOLDINGS

1. The challenged state-court evidentiary rulings did not provide a basis for federal habeas relief because alleged violations of state evidentiary rules are generally not cognizable, and Stevens identified no clearly established Supreme Court holding governing the specific evidence at issue or demonstrating fundamental unfairness.
2. Stevens failed to establish ineffective assistance of counsel because he did not show deficient performance and prejudice under Strickland, and counsel was not ineffective for failing to object to evidence that the state courts reasonably deemed admissible or for failing to raise meritless claims.
3. The alleged prosecutorial misconduct, isolated laughter, presentation of allegedly false testimony, and transcript delay did not deprive Stevens of a fundamentally fair trial or warrant habeas relief.
4. The exclusion of proposed evidence concerning BH's alleged sexual relationship with Karl Peterson and the admission of non-testimonial statements did not violate the Confrontation Clause.
5. The evidence was sufficient for a rational trier of fact to find beyond a reasonable doubt that Stevens aided and abetted Tingley's criminal sexual conduct.
6. Stevens failed to establish a Brady violation because he did not identify suppressed favorable evidence that existed at the time of trial and was material to the outcome.
7. Freestanding actual-innocence claims based on newly discovered evidence were not cognizable absent an independent constitutional violation, and the proffered evidence would not establish actual innocence in any event.
8. Alleged errors in state collateral post-conviction proceedings are outside the scope of federal habeas review.

KEY QUOTATIONS

“A federal habeas court may not “issue the writ simply because that court concludes in its independent judgment that the relevant state-court decision applied clearly established federal law erroneously or incorrectly” (Section II)

FACTUAL BACKGROUND

Stevens was convicted of first- and second-degree criminal sexual conduct arising from sexual acts perpetrated against his stepdaughter, BH, beginning when she was nine and continuing until she was fourteen. The prosecution's theory was that Stevens gave co-defendant James Tingley access to the children in exchange for money or rent, and BH testified about the abuse. The case also involved testimony from BH's siblings, experts, a detective, a therapist, and a jailhouse informant.

PROCEDURAL HISTORY

Stevens was convicted following a jury trial in the Jackson County Circuit Court, and the Michigan Court of Appeals affirmed. The Michigan Supreme Court denied leave to appeal. Stevens pursued multiple state post-conviction motions, including successive motions for relief from judgment, while his federal habeas petition was stayed for exhaustion and later amended. The district court denied the federal habeas petition with prejudice, denied a certificate of appealability, and granted leave to appeal in forma pauperis.

DISPOSITION

dismissed