

SUPREME COURT OF OHIO

State ex rel. Wade v. Shoop

2026-Ohio-2198 · No. 2024-1110 · Decided June 16, 2026

SUMMARY

The Supreme Court of Ohio affirmed dismissal of Jordyn Wade’s habeas corpus petition challenging the jurisdiction of the adult court that convicted him. The court held that the juvenile-to-adult bindover satisfied statutory procedural requirements and that the adult court therefore did not patently and unambiguously lack subject-matter jurisdiction. Applying State v. Turner, the court further held that the adult court’s jurisdiction extended to the offenses charged in the indictment, including aggravated murder and murder counts not specifically charged or supported by a probable-cause finding in juvenile court.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per Curiam; Chief Justice Kennedy; Justice Fischer; Justice DeWine; Justice Deters; Justice Hawkins; Justice Shanahan
JURISDICTION	Supreme Court of Ohio
DECIDED	June 16, 2026
DOCKET	2024-1110
DISPOSITION	affirmed
PROCEDURAL POSTURE	Wade appealed as of right from the Fourth District Court of Appeals' dismissal of his habeas corpus petition under Civ.R. 12(B)(6).
STANDARD OF REVIEW	De novo review of dismissal of a habeas corpus petition; factual allegations are accepted as true, and dismissal is proper only if it appears beyond doubt that the petitioner can prove no set of facts entitling him to relief.
PRECEDENTIAL VALUE	published
PARTIES	Jordyn Wade v. Timothy Shoop, Warden

TOPICS

- habeas corpus
- post-conviction relief
- criminal procedure
- statutory interpretation

PRACTICE AREAS

habeas corpus

juvenile bindover

criminal procedure

post-conviction relief

subject-matter jurisdiction

QUESTIONS PRESENTED

1. Whether Wade's alleged intellectual disability or mental capacity equivalent to that of an 11- or 12-year-old established that the adult court patently and unambiguously lacked subject-matter jurisdiction over his case.
2. Whether the adult court lacked subject-matter jurisdiction to convict Wade of aggravated murder, additional murder counts, and other offenses because the juvenile court had not charged those offenses or specifically found probable cause for them before transferring the case.
3. Whether Wade stated a cognizable claim for habeas corpus relief when he had an adequate remedy in the ordinary course of law through trial and direct appeal.

HOLDINGS

1. Wade's alleged intellectual disability and claimed mental age did not establish a patent and unambiguous lack of subject-matter jurisdiction because he was 16 at the time of the offenses, satisfied the statutory minimum-age requirement for mandatory bindover, and the bindover statutes did not require a separate determination of effective mental capacity.
2. Once the juvenile court transferred Wade's case to adult court, the adult court had subject-matter jurisdiction over the entire case and over any offense for which the grand jury returned an indictment, including aggravated murder and other offenses not specifically charged or supported by a separate juvenile-court probable-cause finding.
3. The petition failed to state a claim for habeas corpus relief because Wade did not plead facts showing that the adult court patently and unambiguously lacked subject-matter jurisdiction, and the Fourth District properly dismissed the petition.

KEY QUOTATIONS

"We may affirm the court of appeals' dismissal of Wade's petition only if it appears beyond doubt that he can prove no set of facts entitling him to relief." (§ 19)

"when a juvenile court transfers a case to the adult court—whether under mandatory- or discretionary-bindover procedures—it transfers the entire case, including all the acts charged in the juvenile complaint." (§ 28)

"The grand jury indicted Wade for all the charges of which he was eventually convicted. Thereafter, the adult court did not patently and unambiguously lack subject-matter jurisdiction to convict Wade of these charges." (§ 30)

FACTUAL BACKGROUND

At age 16, Jordyn Wade participated in an armed home invasion during which four people were killed and a fifth was injured. The juvenile court found probable cause for murder, kidnapping, and attempted murder, transferred

the case to adult court under the mandatory-bindover statute, and the adult grand jury later indicted Wade on 29 counts, including aggravated murder and additional offenses not charged in juvenile court. Wade was convicted of 27 counts and sentenced to 172½ years to life; he later sought habeas relief based on alleged intellectual disability and defects in the bindover proceedings.

PROCEDURAL HISTORY

Wade was transferred from juvenile court to adult court after a mandatory-bindover probable-cause hearing, convicted in adult court, and sentenced to an aggregate term of 172½ years to life. The Tenth District affirmed his convictions, vacated his sentence for failure to consider youth-related mitigating factors, and the same sentence was imposed on remand. Wade then filed a habeas petition in the Fourth District challenging the adult court's subject-matter jurisdiction based on his alleged intellectual disability and the absence of juvenile-court probable-cause findings for several charges. The Fourth District granted the warden's Civ.R. 12(B)(6) motion to dismiss, and the Supreme Court of Ohio affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Wade, 2018-Ohio-976
- State ex rel. Guthrie v. Fender, 2022-Ohio-767
- Humphrey v. Bracy, 2021-Ohio-3836
- Agee v. Russell, 2001-Ohio-1279
- Brooks v. Gaul, 2000-Ohio-133
- In re M.P., 2010-Ohio-599
- Smith v. May, Smith v. May, 2020-Ohio-61
- State ex rel. Mowen v. Mowen, 2008-Ohio-4759
- Atkins v. Virginia, 536 U.S. 304 (2002)
- Roper v. Simmons, 543 U.S. 551 (2005)
- Miller v. Alabama, Miller v. Alabama, 567 U.S. 460 (2012)
- State v. D.W., 2012-Ohio-4544
- Howard v. Randle, 2002-Ohio-2122
- Krauter v. Maxwell, 3 Ohio St.2d 142 (1965)
- Kneuss v. Sloan, 2016-Ohio-3310
- Elersic v. Wilson, 2004-Ohio-1501
- State v. Smith, 2022-Ohio-274
- State v. Turner, 2026-Ohio-1996

