

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI

Aaron Jason LaRose v. David Vandergriff

LaRose v. Vandergriff · No. 4:21-cv-00928-JMD · Decided February 27, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri denied Aaron Jason LaRose’s petition for a writ of habeas corpus under 28 U.S.C. § 2254. The court concluded that the record provided no colorable basis for actual innocence and that LaRose’s factual guilt and the equitable considerations governing habeas relief independently warranted denial without separately resolving his numerous claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri
WRITING FOR THE COURT	Joshua M. Divine
JURISDICTION	United States District Court for the Eastern District of Missouri
DECIDED	February 27, 2026
DOCKET	4:21-cv-00928-JMD
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2254 by a Missouri state prisoner challenging his convictions and sentences.
STANDARD OF REVIEW	Federal habeas relief under 28 U.S.C. § 2254 is subject to both AEDPA's statutory requirements and equitable and prudential considerations. The court may deny relief on equitable grounds without separately resolving every statutory claim.
PRECEDENTIAL VALUE	Unpublished federal district court memorandum and order; persuasive value only.
PARTIES	Aaron Jason LaRose v. David Vandergriff

TOPICS

- federal habeas corpus
- post-conviction relief
- actual innocence
- criminal procedure
- remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal habeas petition should be denied because LaRose failed to satisfy the equitable requirements for habeas relief despite asserting numerous statutory claims under AEDPA.
2. Whether LaRose presented a colorable claim of actual innocence sufficient to overcome the equitable barrier to habeas relief.
3. Whether the court was required to address each of LaRose's approximately 86 habeas claims individually before denying relief.

HOLDINGS

1. A petitioner seeking federal habeas relief must satisfy both the statutory requirements of 28 U.S.C. § 2254 and applicable equitable and prudential requirements; failure to satisfy either independently supports denial of relief.
2. A state habeas petitioner who is factually guilty generally cannot obtain equitable habeas relief, absent an extraordinarily rare circumstance such as conviction under a patently unconstitutional law.
3. LaRose did not establish actual innocence because his proposed alternative explanations and challenges to the evidence did not create a colorable doubt in light of the record as a whole.
4. The court could deny the petition on the independent equitable ground of factual guilt without separately resolving each of LaRose's numerous statutory claims.

KEY QUOTATIONS

“*Even a petitioner who prevails under AEDPA must still today persuade a federal habeas court that law and justice require relief.*” (Introduction)

“*Today, then, a federal court must deny relief to a state habeas petitioner who fails to satisfy either the Supreme Court’s equitable precedents or AEDPA.*” (Introduction)

“A *“reasonable juror,” considering “all of the evidence,” could accept or reject LaRose’s theory and nevertheless convict him in light of the overwhelming evidence against him.*” (Analysis § I)

FACTUAL BACKGROUND

A jury found LaRose guilty of strangling and stabbing his wife, Jill LaRose, after a prolonged period of harassment and controlling behavior during their divorce. The evidence included LaRose’s DNA on a rope used in the killing, Jill’s blood on LaRose’s shoe, shoeprints consistent with his shoes, Jill’s car keys in his bedroom, and a substantial period of unexplained time after their divorce proceeding. LaRose asserted innocence and challenged the State’s evidence, but the court found no colorable basis to doubt his factual guilt.

PROCEDURAL HISTORY

A Missouri jury convicted LaRose of first-degree murder and armed criminal action and the trial court imposed consecutive sentences of life without parole and 30 years. The Missouri Court of Appeals affirmed on direct appeal. After an evidentiary hearing, the state post-conviction court denied relief, and the Missouri Court of Appeals affirmed that denial. LaRose then filed this federal habeas petition asserting at least 86 claims.

DISPOSITION

dismissed

CASES CITED

- Hurst v. Adams, No. 4-24-cv-01666-JMD, 2025 WL 3718303 (E.D. Mo. Dec. 23, 2025)
- Brown v. Davenport, 596 U.S. 118 (2022)
- Precision Instrument Manufacturing Co. v. Automotive Maintenance Machinery Co., 324 U.S. 806 (1945)
- Schlup v. Delo, 513 U.S. 298 (1995)
- Brown v. Allen, 344 U.S. 443 (1953)
- Shinn v. Ramirez, 596 U.S. 366 (2022)
- Edwards v. Vannoy, Edwards v. Vannoy, 593 U.S. 255 (2021)
- State v. LaRose, 412 S.W.3d 294 (Mo. App. E.D. 2013)

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