

SUPREME COURT OF DELAWARE

Reese v. State

Reese v. State · No. No. 6, 2025 · Decided November 24, 2025

SUMMARY

The Delaware Supreme Court affirmed the Superior Court’s denial of Allen Reese’s motion for postconviction relief. The Court rejected his claims of ineffective assistance of counsel, involuntary guilty plea, and Brady violations arising from his Delaware sexual-abuse convictions and related plea proceedings.

CASE DETAILS

COURT	Supreme Court of Delaware
WRITING FOR THE COURT	N. Christopher Griffiths; Seitz, Chief Justice; LeGrow, Justice; Griffiths, Justice
JURISDICTION	Supreme Court of the State of Delaware
DECIDED	November 24, 2025
DOCKET	No. 6, 2025
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from Superior Court's denial of motion for postconviction relief under Superior Court Criminal Rule 61.
STANDARD OF REVIEW	Abuse of discretion for denial of postconviction relief; de novo for legal or constitutional questions including ineffective assistance of counsel claims.
PRECEDENTIAL VALUE	published
PARTIES	Allen Reese v. State of Delaware

TOPICS

- post-conviction relief
- ineffective assistance
- plea bargaining
- criminal procedure
- appellate procedure

PRACTICE AREAS

- criminal law
- post-conviction relief
- appellate practice

QUESTIONS PRESENTED

1. Whether counsel's conduct at arraignment constituted ineffective assistance by failing to notify the court of Reese's desire to withdraw from the plea deal and failing to object to a \$1 million cash bond request.
2. Whether counsel was ineffective for advising Reese to plead guilty without sufficiently investigating the case or pursuing defense strategies.
3. Whether counsel misinformed Reese about his prospects for commutation to induce his guilty plea.
4. Whether the State violated *Brady v. Maryland* by not producing favorable evidence before Reese pleaded guilty.

HOLDINGS

1. Reese's claims relating to the arraignment are without merit. Counsel entered Reese's plea of not guilty and waived reading of the charges, which was all that was required at that stage. Reese failed to show a breakdown in the adversarial process under *Cronic* or prejudice under *Strickland*.
2. Reese has not demonstrated ineffectiveness or prejudice. His claim that Counsel was unfamiliar with the evidence is belied by his own statement that he discussed GPS data and inconsistencies in the child's statements with Counsel before pleading guilty. The strong presumption that Counsel's advice was professionally reasonable is not overcome.
3. Reese is bound by his representations during the plea colloquy that he had not been promised anything not stated in the written plea agreement. He has not provided clear and convincing evidence to the contrary.
4. A knowing and voluntary guilty plea waives a defendant's right to challenge pre-plea errors, including alleged *Brady* violations. Reese acknowledged being aware of the GPS data and inconsistencies before pleading guilty, and his plea was knowing, intelligent, and voluntary. He cannot claim prejudice after intentionally bypassing the Delaware discovery process.

KEY QUOTATIONS

“Under the ‘well-worn standards’ articulated in Strickland v. Washington, to prevail on a claim of ineffective assistance of counsel, a defendant must demonstrate that (i) his defense counsel’s representation fell below an objective standard of reasonableness, and (ii) there is a reasonable probability that but for counsel’s unprofessional errors, the result of the proceeding would have been different.” (¶ 9)

“‘Where the alleged error of counsel is a failure to investigate, a determination of ‘prejudice’ to the defendant by causing him to plead guilty depends upon the likelihood that the additional effort by counsel would have led to a change in counsel’s recommendation as to that plea.’” (¶ 9)

“It is well settled that ‘a knowing and voluntary guilty plea waives a defendant’s right to challenge any errors occurring before the entry of the plea,’ including alleged Brady violations.” (¶ 15)

FACTUAL BACKGROUND

Reese, a counselor, was accused of taking temporary custody of a fifteen-year-old foster child, driving him to Maryland, and sexually assaulting him in both states. After DNA was collected, Reese booked a flight to Morocco but was arrested in Maryland. While in custody there, a Delaware grand jury indicted him for sexual

abuse and endangering the welfare of a child. A global plea deal was negotiated to resolve charges in both states concurrently. Reese pleaded guilty in Delaware to lesser-included offenses and was sentenced to thirteen years in prison.

PROCEDURAL HISTORY

Reese pleaded guilty to first-degree and second-degree sexual abuse of a child. He later filed a motion for postconviction relief, which the Superior Court denied. Reese appealed to the Supreme Court of Delaware.

DISPOSITION

affirmed

CASES CITED

- Strickland v. Washington, 466 U.S. 668 (1984)
- United States v. Cronin, 466 U.S. 648 (1984)
- Hill v. Lockhart, 474 U.S. 52 (1985)
- Ploof v. State, 75 A.3d 811 (Del. 2013)
- Bradley v. State, 135 A.3d 748 (Del. 2016)
- Cephas v. State, 2022 WL 1552149 (Del. May 17, 2022)
- Green v. State, 238 A.3d 160 (Del. 2020)
- Albury v. State, 551 A.2d 53 (Del. 1988)
- Dorio v. State, 2012 WL 6632923 (Del. Dec. 18, 2012)
- Brady v. Maryland, 373 U.S. 83 (1963)
- Benson v. State, 2020 WL 5951371 (Del. Oct. 6, 2020)
- Mack v. State, 2019 WL 7342514 (Del. Dec. 30, 2019)
- Reese v. Bounds, 2021 WL 849108 (D. Md. Mar. 5, 2021)