

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

Keith Darnell Taylor v. Tim Shoop, Warden

Taylor v. Shoop · No. 1:25-cv-00686 · Decided February 2, 2026

SUMMARY

A United States magistrate judge recommends dismissal with prejudice of Keith Darnell Taylor’s federal habeas corpus petition challenging his guilty pleas and the effectiveness of trial and appellate counsel. The court concludes that the Ohio courts reasonably rejected the underlying claims and that appellate counsel was not ineffective for omitting meritless issues. The recommendation also advises denying a certificate of appealability and certifying that any appeal would be objectively frivolous.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
WRITING FOR THE COURT	Michael R. Merz
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
DECIDED	February 2, 2026
DOCKET	1:25-cv-00686
DISPOSITION	other
PROCEDURAL POSTURE	Report and recommendations on an amended 28 U.S.C. § 2254 habeas petition challenging state-court decisions concerning the validity of Taylor's guilty pleas and the effectiveness of trial and appellate counsel.
STANDARD OF REVIEW	Under 28 U.S.C. § 2254(d)(1), a federal court must defer to a state-court merits decision unless it was contrary to, or involved an objectively unreasonable application of, clearly established Supreme Court precedent. Procedural-default questions are analyzed under the four-part Maupin framework, followed by consideration of cause and prejudice or a fundamental miscarriage of justice.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Keith Darnell Taylor v. Tim Shoop, Warden, Ross Correctional Institution

TOPICS

federal habeas corpus

post-conviction relief

ineffective assistance

appellate procedure

PRACTICE AREAS

federal habeas corpus

post-conviction relief

ineffective assistance

criminal procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether Taylor's federal habeas claim that his guilty pleas were invalid because of an alleged sentencing promise and lack of understanding regarding allied offenses warranted relief.
2. Whether appellate counsel rendered ineffective assistance by failing to raise claims concerning the alleged invalidity of Taylor's guilty pleas and related sentencing issues.
3. Whether the Ohio courts' rejection of Taylor's ineffective-assistance claims was contrary to or an unreasonable application of clearly established Supreme Court law.

HOLDINGS

1. The state court reasonably rejected Taylor's ineffective-assistance claim because the proposed challenge to the validity of his guilty plea lacked merit; counsel cannot be ineffective for failing to raise a meritless assignment of error.
2. Taylor's claim that appellate counsel was ineffective for omitting proposed assignments of error fails because the omitted assignments were meritless under the state appellate court's determinations.
3. The court applied the procedural-default doctrine and its cause-and-prejudice framework, but dismissed Taylor's two grounds on the merits because the relevant state courts adjudicated the underlying ineffective-assistance claims.

KEY QUOTATIONS

“Unless a defendant makes both showings, it cannot be said that the conviction or death sentence resulted from a breakdown in the adversary process that renders the result unreliable.” (466 U.S. at 687)

“Based on the foregoing analysis, the Magistrate Judge respectfully recommends the Petition be dismissed with prejudice.” (Conclusion)

FACTUAL BACKGROUND

On April 6, 2023, a Muskingum County grand jury indicted Taylor on forty-five theft-related counts. Pursuant to a negotiated plea, Taylor pleaded guilty to engaging in a pattern of corrupt activity with a firearm specification, multiple theft and identity-fraud counts, felonious assault with a firearm specification, and grand theft of a motor vehicle; the remaining charges were dismissed. He received a sentence of 21.5 to 26 years. Taylor later contended that he had been promised a six-to-twelve-year sentence and had not understood that his offenses

would not merge as allied offenses of similar import, but the state appellate court found that the plea record contradicted those assertions.

PROCEDURAL HISTORY

Taylor pleaded guilty in the Muskingum County Court of Common Pleas to multiple theft-related offenses, engaging in a pattern of corrupt activity, and felonious assault, receiving an aggregate sentence of 21.5 to 26 years. The Ohio Fifth District Court of Appeals affirmed his conviction, and the Ohio Supreme Court declined jurisdiction after granting leave for a delayed appeal. The Fifth District denied Taylor's Ohio Appellate Rule 26(B) application alleging ineffective assistance of appellate counsel. After additional unsuccessful state proceedings, Taylor filed this federal habeas action. The magistrate judge recommends dismissal with prejudice and denial of a certificate of appealability.

DISPOSITION

other

CASES CITED

- Coleman v. Thompson, 501 U.S. 722, 750 (1991)
- Strickland v. Washington, 466 U.S. 668 (1984)
- Wainwright v. Sykes, 433 U.S. 72 (1977)
- Engle v. Isaac, 456 U.S. 107, 110 (1982)
- Davila v. Davis, 582 U.S. 521, 527 (2017)
- Maupin v. Smith, 785 F.2d 135, 138 (6th Cir. 1986)
- State v. Perry, 10 Ohio St. 2d 175 (1967)
- Harrington v. Richter, 562 U.S. 86, 100 (2011)