

COURT OF CRIMINAL APPEALS OF TENNESSEE

Michael Eugene St. Clair v. State of Tennessee

No. M2025-00482-CCA-R3-HC · No. M2025-00482-CCA-R3-HC · Decided December 29, 2025

SUMMARY

The Tennessee Court of Criminal Appeals affirmed the dismissal of Michael Eugene St. Clair’s habeas corpus petition challenging the imposition of lifetime community supervision following a rape conviction. The court held that Williamson County was not a proper venue and that the petitioner failed to provide an adequate record, including the transcript of the guilty plea hearing. The court also concluded that the trial court had authority to correct the illegal sentence after the petitioner’s confinement term ended but while lifetime supervision remained in effect.

CASE DETAILS

COURT	Court of Criminal Appeals of Tennessee
WRITING FOR THE COURT	J. Ross Dyer; Robert L. Holloway, Jr.; Robert H. Montgomery, Jr.
JURISDICTION	Tennessee Court of Criminal Appeals
DECIDED	December 29, 2025
DOCKET	M2025-00482-CCA-R3-HC
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal as of right from the Williamson County Circuit Court's dismissal of a petition for writ of habeas corpus.
STANDARD OF REVIEW	Whether habeas corpus relief should be granted is a question of law reviewed de novo without a presumption of correctness. The court also reviewed the habeas court's summary dismissal for abuse of discretion.
PRECEDENTIAL VALUE	Published Tennessee Court of Criminal Appeals opinion
PARTIES	Michael Eugene St. Clair v. State of Tennessee

TOPICS

- habeas corpus
- state post-conviction relief
- appellate procedure
- standard of review
- statutory interpretation

PRACTICE AREAS

- Tennessee habeas corpus
- criminal procedure
- sentencing
- post-conviction relief
- appellate procedure

QUESTIONS PRESENTED

1. Whether Williamson County was a proper venue for St. Clair's habeas corpus petition based on the location of his appointed counsel.
2. Whether the habeas court properly summarily dismissed the petition for failure to provide the transcript of the guilty-plea hearing.
3. Whether the trial court had authority to correct the judgment after St. Clair had completed his term of confinement.
4. Whether the corrected judgment imposing lifetime community supervision reflected an illegal sentence or an unauthorized sentence correction.

HOLDINGS

1. Williamson County was not a proper venue because St. Clair resided in Sumner County and did not provide a sufficient reason for filing in Williamson County rather than in the geographically nearest court or the convicting court in Davidson County.
2. The habeas court properly summarily dismissed the petition because St. Clair failed to provide an adequate record, including the transcript of the guilty-plea hearing, necessary to determine whether lifetime supervision was discussed and imposed.
3. The trial court had authority to enter the corrected judgment because lifetime community supervision was a statutorily mandated part of the sentence and had not expired when the corrected judgments were entered.

KEY QUOTATIONS

“Habeas corpus procedural requirements “are mandatory and must be followed scrupulously.”” (-3-)

“The “petitioner bears the burden of providing an adequate record for summary review in a habeas corpus petition.”” (-4-)

“The petitioner’s full sentences had not expired at the time the corrected judgments of conviction were entered, and, as a result, the trial court had the authority to correct the illegal sentences contained in the judgments of conviction.” (-5-)

FACTUAL BACKGROUND

In 2002, St. Clair pleaded guilty in Davidson County to rape and received an eight-year sentence to be served on probation. The plea paperwork and judgments included sex-offender treatment and registration but did not expressly include the statutorily mandated sentence of lifetime community supervision. After his probation was revoked and he completed his confinement, the trial court entered a corrected judgment in 2010 adding lifetime community supervision, and St. Clair acknowledged the corrected sentence. In 2024, while residing in Sumner County, he filed a habeas petition in Williamson County and challenged the corrected judgment.

PROCEDURAL HISTORY

St. Clair filed a Tennessee habeas corpus petition in Williamson County challenging the legality of the lifetime community-supervision component of his sentence. The habeas court dismissed the petition for improper venue and for failure to include the transcript of the guilty-plea hearing. The Court of Criminal Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Taylor v. State, 995 S.W.2d 78, 83 (Tenn. 1999)
- Hessmer v. State, No. M2024-01563-CCA-R3-HC, 2025 WL 1894830, at *3 (Tenn. Crim. App. 2025)
- State ex rel. Leach v. Avery, 387 S.W.2d 346, 347 (Tenn. 1964)
- Davis v. State, 261 S.W.3d 16, 22 (Tenn. Crim. App. 2008)
- Archer v. State, 851 S.W.2d 157, 165 (Tenn. 1993)
- Bateman v. Smith, 194 S.W.2d 336, 337 (Tenn. 1946)
- Summers v. State, 212 S.W.3d 251, 255, 259-61 (Tenn. 2007)
- State v. Brown, 479 S.W.3d 200 (Tenn. 2015)
- Anthony Leslie v. State, No. M2018-00856-CCA-R3-HC, 2019 WL 3814623 (Tenn. Crim. App. Aug. 14, 2019)
- Carr v. State, No. M2017-01389-CCA-R3-PC, 2019 WL 6220966, at *7 (Tenn. Crim. App. Nov. 21, 2019)
- Calvert v. State, 342 S.W.3d 477 (Tenn. 2011)
- State v. Nagele, 353 S.W.3d 112 (Tenn. 2011)