

SUPREME COURT OF ARKANSAS

Thomas Crockett v. Dexter Payne, Director, Arkansas Division of Correction

2026 Ark. 62 · No. CV-25-425 · Decided April 16, 2026

SUMMARY

The Arkansas Supreme Court affirmed the denial of Thomas Crockett’s second petition for a writ of habeas corpus. The court held that his challenges concerning the charging information, alleged ineffective assistance of counsel, and due process were not cognizable in habeas proceedings because they did not establish facial invalidity of the judgment or a lack of jurisdiction; his motion to file a belated reply brief was moot.

CASE DETAILS

COURT	Supreme Court of Arkansas
WRITING FOR THE COURT	Rhonda K. Wood, Associate Justice; Mary Carole Young, Special Justice
JURISDICTION	Supreme Court of Arkansas
DECIDED	April 16, 2026
DOCKET	CV-25-425
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial of Crockett's second petition for a writ of habeas corpus; motion to file a belated reply brief.
STANDARD OF REVIEW	A circuit court's decision on a petition for a writ of habeas corpus is affirmed unless clearly erroneous. A decision is clearly erroneous when the appellate court is left with the definite and firm conviction that a mistake has been made.
PRECEDENTIAL VALUE	Published Arkansas Supreme Court opinion
PARTIES	Thomas Crockett v. Dexter Payne, Director, Arkansas Division of Correction

TOPICS

- habeas corpus
- state post-conviction relief
- ineffective assistance
- due process
- appellate procedure

PRACTICE AREAS

post-conviction relief

criminal procedure

appellate procedure

constitutional law

QUESTIONS PRESENTED

1. Whether alleged defects in the charging document and the reduction of the charge from capital murder to first-degree murder were cognizable grounds for habeas relief.
2. Whether alleged ineffective assistance of counsel during plea proceedings and plea negotiations supported issuance of a writ of habeas corpus.
3. Whether the circuit court violated due process by refusing to consider matters beyond the face of the judgment in denying the habeas petition.
4. Whether the circuit court clearly erred in denying Crockett's second habeas petition.

HOLDINGS

1. Claims that the information was defective or that a new information was required after the charge was reduced from capital murder to first-degree murder are claims of trial error and are not cognizable in a habeas proceeding.
2. Ineffective-assistance-of-counsel claims, including claims concerning plea negotiations and counsel's investigation, are not cognizable grounds for a writ of habeas corpus.
3. A court considering a habeas petition is not required to go beyond the face of the judgment to address the petitioner's claims, and the petitioner bears the burden of showing that the face of the judgment is invalid.
4. The circuit court did not clearly err in denying Crockett's habeas petition because he failed to raise a cognizable habeas claim.

KEY QUOTATIONS

“A writ of habeas corpus is proper when a judgment and commitment order is invalid on its face or when a circuit court lacks jurisdiction over the cause.” (at 2)

“Ineffective-assistance-of- counsel claims are not cognizable in habeas proceedings.” (at 3)

FACTUAL BACKGROUND

In 1983, Thomas Crockett pleaded guilty in open court to first-degree murder and was sentenced to life imprisonment. He admitted that he robbed and murdered James Williams. In his second habeas petition, he challenged the charging document and the reduction of the charge from capital murder to first-degree murder, alleged a Sixth Amendment violation during plea proceedings, and asserted ineffective assistance during plea negotiations and investigation.

PROCEDURAL HISTORY

Crockett pleaded guilty to first-degree murder in 1983 and received a life sentence. His prior Rule 37 ineffective-assistance petition and an earlier habeas petition were denied. The Jefferson County Circuit Court denied his second habeas petition, and the Supreme Court of Arkansas affirmed; it also held his motion to file a belated reply brief moot.

DISPOSITION

affirmed

CASES CITED

- Crockett v. State, 282 Ark. 582, 669 S.W.2d 896 (1984)
- Crockett v. Kelley, 2020 Ark. 26
- Burks v. Payne, 2024 Ark. 80, 687 S.W.3d 798
- Finney v. Kelley, 2020 Ark. 145, 598 S.W.3d 26
- Fuller/Akbar v. Payne, 2021 Ark. 155, 628 S.W.3d 366
- Mitchell v. State, 2018 Ark. 331
- True v. Payne, 2021 Ark. 154, 628 S.W.3d 641
- Rea v. Kelley, 2020 Ark. 347