

COURT OF APPEALS OF OHIO, TENTH APPELLATE DISTRICT

State v. Michie

2026-Ohio-163 (10th Dist.) · No. 25AP-299 · Decided January 20, 2026

SUMMARY

The Ohio Tenth District Court of Appeals affirmed the denial of Tyrone Michie's postconviction motions to withdraw his guilty plea and vacate his sentence for lack of subject-matter jurisdiction. The court held that Michie's claims, including ineffective assistance of counsel and challenges to the search warrant, were barred by res judicata because they had been or could have been raised in earlier proceedings.

CASE DETAILS

COURT	Court of Appeals of Ohio, Tenth Appellate District
WRITING FOR THE COURT	Boggs, P.J.; Jamison, J.; Dingus, J.
JURISDICTION	Court of Appeals of Ohio, Tenth Appellate District
DECIDED	January 20, 2026
DOCKET	25AP-299
DISPOSITION	affirmed
PROCEDURAL POSTURE	Michie appealed the Franklin County Court of Common Pleas' denial of multiple postconviction motions seeking to withdraw his guilty plea and vacate or set aside his sentence for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The assignments of error asserted abuse of discretion, but the court resolved the appeal on the legal ground of res judicata without reaching the merits of the motions.
PRECEDENTIAL VALUE	Published Ohio Court of Appeals opinion
PARTIES	Tyrone Michie v. State of Ohio

TOPICS

- state post-conviction relief
- successive petitions
- ineffective assistance
- plea bargaining
- appellate procedure

PRACTICE AREAS

- criminal procedure
- post-conviction relief
- appellate procedure

QUESTIONS PRESENTED

1. Whether res judicata barred Michie's 2023 motions to withdraw his guilty plea based on ineffective assistance of counsel.
2. Whether res judicata barred Michie's 2023 motions to vacate or set aside his sentence for lack of subject-matter jurisdiction.
3. Whether the trial court erred by denying the motions without a hearing or by failing to correct an alleged manifest injustice.

HOLDINGS

1. Res judicata barred Michie's 2023 motions because they raised the same subject-matter-jurisdiction issue presented in his dismissed 2020 motion, which he did not appeal.
2. Res judicata barred Michie's 2023 ineffective-assistance claims because he had previously litigated, or could have previously litigated, the asserted grounds for counsel's ineffectiveness.

KEY QUOTATIONS

“Under the doctrine of res judicata, a final judgment of conviction bars a convicted defendant who was represented by counsel from raising and litigating in any proceeding, except an appeal from that judgment, any defense or any claimed lack of due process that was raised or could have been raised by the defendant at the trial, which resulted in that judgment of conviction, or on an appeal from that judgment.” (¶ 13)

“Michie’s 2023 motions to withdraw his guilty plea and vacate his sentence raise issues he either did litigate previously or could have litigated previously, and they are therefore barred by res judicata.” (¶ 14)

FACTUAL BACKGROUND

Police executed a search warrant at Michie's apartment and seized approximately four kilograms of cocaine and 740 grams of methamphetamine. Michie was later arrested following a traffic stop and was indicted on drug-possession charges. In May 2018, he pleaded guilty to possession of cocaine and a stipulated lesser-included drug-possession offense in exchange for the State's agreement not to pursue additional charges, and he was sentenced to an aggregate mandatory prison term of 16 years. His later postconviction motions challenged the search, the effectiveness of counsel, the voluntariness of his plea, and the trial court's subject-matter jurisdiction.

PROCEDURAL HISTORY

Michie pleaded guilty in 2018 and received an aggregate mandatory prison sentence of 16 years. He unsuccessfully pursued an initial postconviction petition in 2019, which this court affirmed in *State v. Michie*, 2020-Ohio-3152. He filed a separate 2020 motion challenging subject-matter jurisdiction, which the trial court dismissed and he did not appeal. The trial court denied his 2023 motions in a single January 27, 2025 entry, and the Tenth District affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Michie, 2020-Ohio-3152 (10th Dist.)
- State v. Szefcyk, 1996-Ohio-337
- Federated Department Stores v. Moitie, 452 U.S. 394 (1981)
- Baldwin v. Iowa State Traveling Men's Assn., 283 U.S. 522 (1931)
- State v. Knowles, 2016-Ohio-2859 (10th Dist.)
- State v. Turner, 2007-Ohio-1468 (10th Dist.)
- State v. Wooden, 2002-Ohio-7363 (10th Dist.)
- State v. Muhumed, 2012-Ohio-6155 (10th Dist.)
- State v. Sappington, 2010-Ohio-1783 (10th Dist.)

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