

SUPREME COURT OF THE STATE OF DELAWARE

Bennefield v. State

No. 481, 2015 (Del. Dec. 18, 2015) · No. No. 481, 2015 · Decided December 18, 2015

SUMMARY

The Delaware Supreme Court affirmed the dismissal of Jaron R. Bennefield’s petition for a writ of habeas corpus. The Court held that his facially valid commitment following a guilty plea and sentence did not support habeas relief and explained that claims of actual innocence or insufficient evidence must be brought under Superior Court Criminal Rule 61.

CASE DETAILS

COURT	Supreme Court of the State of Delaware
WRITING FOR THE COURT	Karen L. Valihura; Holland; Valihura; Vaughn
JURISDICTION	Delaware
DECIDED	December 18, 2015
DOCKET	No. 481, 2015
DISPOSITION	affirmed
PROCEDURAL POSTURE	Bennefield appealed the Superior Court's dismissal of his petition for a writ of habeas corpus. The State moved to affirm under Delaware Supreme Court Rule 25(a), and the Supreme Court granted the motion and affirmed.
STANDARD OF REVIEW	The appeal was resolved under the standard applicable to a motion to affirm when it is manifest on the face of the opening brief that the appeal is without merit.
PRECEDENTIAL VALUE	Published Delaware Supreme Court order
PARTIES	Jaron R. Bennefield v. State of Delaware

TOPICS

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

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether habeas corpus relief was available where the petitioner challenged his conviction and asserted actual innocence, but the commitment was regular on its face and the sentencing court had jurisdiction.
2. Whether claims seeking to set aside a final judgment of conviction must instead be brought under Delaware Superior Court Criminal Rule 61.

HOLDINGS

1. Habeas corpus relief was unavailable because the Superior Court had subject matter jurisdiction, authority to accept Bennefield's guilty plea and impose sentence, and the commitment was valid on its face.
2. Claims of actual innocence, insufficient evidence, and other claims seeking to set aside a final judgment of conviction must be brought in a postconviction proceeding under Superior Court Criminal Rule 61, not in a habeas corpus petition.

KEY QUOTATIONS

“Where the commitment was regular on its face and the court clearly had jurisdiction over the subject matter, habeas corpus does not afford a remedy to the petitioner.” (at 3)

“Claims for postconviction relief are not cognizable in a petition for a writ of habeas corpus.” (at 4)

FACTUAL BACKGROUND

Bennefield was indicted in 2014 on drug dealing, weapons, child-endangerment, and drug-paraphernalia charges. He pleaded guilty to drug dealing, received a sentence of eight years at Level V suspended after two years for probation, and did not appeal directly. He then sought habeas relief based on claims of innocence and illegal imprisonment, although his commitment followed a valid conviction and sentence.

PROCEDURAL HISTORY

Bennefield pleaded guilty in the Superior Court to drug dealing in exchange for dismissal of the remaining charges and a sentencing recommendation of no more than three years of incarceration. The Superior Court sentenced him to eight years at Level V, suspended after two years for one year at Level III probation. He did not file a direct appeal, but instead filed a habeas petition alleging actual innocence and illegal imprisonment; the Superior Court dismissed the petition, concluding that he was lawfully held and that habeas corpus was not the proper vehicle for postconviction claims.

DISPOSITION

affirmed

CASES CITED

- Evans v. State, 1988 WL 46628 (Del. May 10, 1988)
- Curran v. Wooley, 104 A.2d 771 (Del. 1954)

- Jones v. Anderson, 183 A.2d 177 (Del. 1962)

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