

SUPREME COURT OF ALABAMA

Ex parte Mason John Grimes; Ex parte Brooklyn Paige Grimes (consolidated)

Grimes · No. SC-2025-0172; SC-2025-0279 · Decided March 13, 2026

SUMMARY

The Supreme Court of Alabama consolidated habeas petitions filed by Mason John Grimes and Brooklyn Paige Grimes, who sought bail while awaiting trial on capital-murder charges. The court reviewed Alabama's historical rule that an indictment creates a presumption of guilt for purposes of bail and denied both petitions. The opinion discusses the constitutional and statutory standards governing bail in capital cases and the evidence presented at the petitioners' bail hearings.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	McCool, Justice; Stewart, C.J.; Parker, J.; McCool, J.; Shaw, J.; Bryan, J.; Mendheim, J.; Wise, J.; Cook, J.; Sellers, J.
JURISDICTION	Supreme Court of Alabama
DECIDED	March 13, 2026
DOCKET	SC-2025-0172; SC-2025-0279
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Consolidated petitions for writs of habeas corpus challenging the denial of bail to defendants awaiting trial on capital-murder charges.
STANDARD OF REVIEW	The denial of bail after an evidentiary hearing will not be disturbed absent manifest error; appellate courts defer to the trial court's credibility determinations and do not reweigh evidence.
PRECEDENTIAL VALUE	Published, precedential opinion of the Supreme Court of Alabama; majority holding binding under Alabama law.
PARTIES	Mason John Grimes, Brooklyn Paige Grimes v. State of Alabama

TOPICS

bail

habeas corpus

criminal procedure

statutory interpretation

constitutional law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Alabama's longstanding rule that an indictment for capital murder creates a presumption of guilt that the defendant must overcome to obtain bail should be abolished as inconsistent with the Alabama Constitution and § 15-13-3(a), Ala. Code 1975.
2. Whether the petitioners presented sufficient evidence to overcome the indictment-created presumption of guilt and obtain bail.
3. Whether denial of bail under the circumstances violated the Eighth Amendment to the United States Constitution.

HOLDINGS

1. The indictment-created presumption-of-guilt rule remains valid Alabama law. When a defendant has been indicted for capital murder, the indictment creates a presumption of guilt for purposes of the bail hearing, and the defendant bears the burden of presenting evidence that overcomes the presumption.
2. The petitioners did not demonstrate entitlement to habeas relief by showing that their evidence overcame the presumption of guilt. The Supreme Court would not substitute its judgment for the circuit court's credibility and evidentiary determinations.
3. The denial of bail did not violate the Eighth Amendment because the Eighth Amendment does not guarantee that bail will be available in every case; it prohibits excessive bail when bail is granted.

KEY QUOTATIONS

“Unless and until that occurs, however, the presumption rule remains good law in Alabama, which means that, when a defendant has been indicted for capital murder, the indictment creates a presumption of guilt that justifies the trial court in denying bail.” (42-43)

“Thus, when a defendant has been indicted for capital murder, the indictment creates a presumption of guilt -- for purposes of a bail hearing only -- and, to be entitled to bail, the defendant must present evidence that, when weighed against any evidence that the State chooses to present, convinces the trial court that the presumption has been overcome.” (48)

FACTUAL BACKGROUND

The petitioners, a married couple who had served as foster parents, received custody of E.E., an infant with serious health issues requiring a feeding tube and frequent hospitalization. E.E. died in November 2023 while in their custody. A Blount County grand jury indicted both petitioners for capital murder, alleging that they intentionally caused the death of a child under fourteen, along with intentional murder, felony murder, and aggravated child abuse. After bail hearings, the circuit court denied bail, and the petitioners sought habeas relief.

PROCEDURAL HISTORY

The petitioners were indicted by a Blount County grand jury for capital murder and related offenses. After evidentiary bail hearings, the Blount Circuit Court denied bail, relying on the indictment-created presumption of guilt and finding that the evidence could sustain a capital-murder conviction. The Court of Criminal Appeals denied habeas relief, and the petitioners sought relief in the Supreme Court of Alabama, which denied both petitions.

DISPOSITION

writ_denied

CASES CITED

- Ex parte Bryant, 34 Ala. 270 (1859)
- Ex parte Vaughan, 44 Ala. 417 (1870)
- Ex parte Hammock, 78 Ala. 414 (1885)
- Ex parte Hall, 844 So. 2d 571 (Ala. 2002)
- Ex parte Patel, 879 So. 2d 532 (Ala. 2003)
- Ex parte Wilding, 41 So. 3d 75 (Ala. 2009)
- State v. Moyers, 214 So. 3d 1147 (Ala. 2014)
- Ex parte Sloane, 95 Ala. 22, 11 So. 14 (1892)
- Hexcel Decatur, Inc. v. Vickers, 908 So. 2d 237 (Ala. 2005)
- Ex parte City of Orange Beach, [Ms. SC-2024-0526, Apr. 4, 2025] ____ So. 3d ____ (Ala. 2025)
- United States v. Salerno, 481 U.S. 739 (1987)
- White v. Illinois, 502 U.S. 346 (1992)
- Davis v. Alaska, 415 U.S. 308 (1974)
- Ex parte Loggins, 771 So. 2d 1093 (Ala. 2000)
- Ex parte Roberts, 735 So. 2d 1270 (Ala. 1999)