

COURT OF APPEALS OF ARKANSAS, DIVISION III

Randy Curtis v. State of Arkansas

Curtis, 2026 Ark. App. 94 (Ark. Ct. App. 2026) · No. CR-25-256 · Decided February 11, 2026

SUMMARY

The Arkansas Court of Appeals affirmed Randy Curtis’s conviction for failing to comply with sex-offender registration and reporting requirements. The court held that the challenge to the vehicle-reporting theory was not preserved because it was not raised in the directed-verdict motion, and it declined to address the alternative change-of-address theory. The court remanded for correction of a clerical error in the sentencing order concerning Curtis’s habitual-offender status.

CASE DETAILS

COURT	Court of Appeals of Arkansas, Division III
WRITING FOR THE COURT	Kenneth S. Hixson; Wood, J.; Brown, J.
JURISDICTION	Arkansas Court of Appeals, Division III
DECIDED	February 11, 2026
DOCKET	CR-25-256
DISPOSITION	affirmed
PROCEDURAL POSTURE	Curtis appealed his jury conviction for failure to comply with sex-offender registration and reporting requirements, challenging the denial of his motion for directed verdict. The Court of Appeals affirmed the conviction but remanded for correction of a clerical error in the sentencing order.
STANDARD OF REVIEW	A motion for directed verdict is treated as a challenge to the sufficiency of the evidence. The court reviews the evidence in the light most favorable to the State, considers only evidence supporting the verdict, and affirms if substantial evidence supports the conviction. Substantial evidence is evidence of sufficient force and character to compel a conclusion without speculation or conjecture. Witness credibility and conflicting evidence are matters for the jury.
PRECEDENTIAL VALUE	Published Arkansas Court of Appeals opinion
PARTIES	Randy Curtis v. State of Arkansas

TOPICS

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QUESTIONS PRESENTED

1. Whether substantial evidence supported Curtis's conviction for failing to report required information concerning vehicles he owned, operated, or had access to.
2. Whether Curtis preserved his argument that the State failed to prove he was outside the statutory five-day reporting period.
3. Whether the sentencing order contained a clerical error requiring correction on remand.

HOLDINGS

1. The argument was not preserved because Curtis did not raise the five-day-period contention in his directed-verdict motion and could not enlarge the grounds of that motion on appeal.
2. Substantial evidence supported the conviction because the State presented evidence that Curtis had access to vehicles that he failed to report as required.
3. The sentencing order had a clerical error because it did not indicate that Curtis was sentenced as a habitual offender, and the case was remanded for the circuit court to correct the order.

KEY QUOTATIONS

“An appellant may not expand or enlarge the grounds for a directed-verdict motion when arguing the issue on appeal.” (at 7)

“The circuit court is free to correct a clerical error to have the judgment speak the truth.” (at 8)

FACTUAL BACKGROUND

Curtis was required to comply with Arkansas sex-offender registration and reporting requirements. At a September 14, 2023 registration renewal, he reported access only to a 1994 blue Ford F150 and listed his address as 316 Ranger Drive, although evidence showed that he and his wife had access to a white Ford pickup and a black Ford Taurus. Curtis later admitted to the investigating officer that he had forgotten to register those vehicles. The jury convicted him, found him to be a habitual offender, and imposed a twenty-year sentence.

PROCEDURAL HISTORY

Curtis was charged in the Hot Spring County Circuit Court with a Class C felony under Arkansas Code Annotated section 12-12-904 and as a habitual offender. After a jury trial, he was convicted and sentenced to twenty years' imprisonment. The circuit court denied his directed-verdict motions, and the Court of Appeals affirmed the conviction while remanding for correction of the sentencing order.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

Remand to the Hot Spring County Circuit Court for the limited purpose of correcting the sentencing order to indicate that Curtis was sentenced as a habitual offender.

CASES CITED

- *Armstrong v. State*, 2020 Ark. 309, 607 S.W.3d 491
- *Collins v. State*, 2021 Ark. 35, 617 S.W.3d 701
- *Benton v. State*, 2020 Ark. App. 223, 599 S.W.3d 353
- *Hall v. State*, 2022 Ark. App. 232, 646 S.W.3d 204
- *Adams v. State*, 2020 Ark. App. 107, 594 S.W.3d 884
- *Kelly v. State*, 2025 Ark. App. 519
- *Echoles v. State*, 2017 Ark. App. 352, 524 S.W.3d 417
- *Taylor v. State*, 2010 Ark. 372, 372 S.W.3d 769
- *Norris v. State*, 2010 Ark. 174, 368 S.W.3d 52
- *Battles v. State*, 2024 Ark. App. 198
- *Carter v. State*, 2019 Ark. App. 57, 568 S.W.3d 788