

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Tom Love Vinson v. Raymond Madden

Vinson v. Madden · No. 2:18-cv-06783-FLA (JC) · Decided July 9, 2025

SUMMARY

The United States District Court for the Central District of California accepts the magistrate judge’s findings and recommendations in a federal habeas corpus action. The court denies the petition, dismisses the action with prejudice, and orders judgment entered, concluding that the petitioner’s objections do not overcome procedural default or establish entitlement to relief.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Fernando L. Aenlle-Rocha
JURISDICTION	United States District Court for the Central District of California
DECIDED	July 9, 2025
DOCKET	2:18-cv-06783-FLA (JC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a state prisoner’s petition for a writ of habeas corpus under 28 U.S.C. § 2254, the magistrate judge’s report and recommendation recommending denial and dismissal with prejudice, and the petitioner’s objections.
STANDARD OF REVIEW	The district court conducted de novo review of the portions of the magistrate judge’s report and recommendation to which the petitioner objected. In reviewing the habeas claims, the court applied federal habeas procedural-default principles, including the adequacy and independence of California’s timeliness rule, and deference to state-court factual findings and adjudications.
PRECEDENTIAL VALUE	Unknown
PARTIES	Tom Love Vinson v. Raymond Madden

TOPICS

- federal habeas corpus
- default
- actual innocence
- ineffective assistance
- post-conviction relief

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Criminal procedure

QUESTIONS PRESENTED

1. Whether California's untimeliness rule was an inadequate state procedural ground because it was allegedly misapplied in Vinson's case.
2. Whether Vinson established cause and prejudice to excuse the procedural default of his ineffective-assistance and gang-enhancement claims.
3. Whether Vinson established a fundamental miscarriage of justice through a credible actual-innocence showing sufficient to overcome procedural default.
4. Whether the California Court of Appeal's rejection of Vinson's claim concerning the trial court's response to the jury's transferred-intent question was objectively unreasonable.

HOLDINGS

1. California's timeliness rule is an independent and adequate state-law ground sufficient to bar federal habeas relief on untimely claims, and a federal habeas court lacks authority to review a state court's alleged misinterpretation or misapplication of its own procedural rules.
2. Vinson did not establish cause to excuse the procedural default of his claims concerning ineffective assistance of trial counsel and insufficient evidence for the gang enhancement because the factual and legal bases for those claims were available when he defaulted them.
3. Vinson did not establish a fundamental miscarriage of justice or actual innocence sufficient to overcome procedural default.
4. The state court's rejection of Vinson's claim concerning the trial court's response to the jury's transferred-intent question was not objectively unreasonable.

KEY QUOTATIONS

"It is well-established that California's untimeliness rule is adequate." (at 1)

"The Petition is DENIED; The Petition and this action are DISMISSED, and Judgment shall be entered accordingly;" (at 2)

FACTUAL BACKGROUND

Vinson challenged his state-court criminal conviction through a federal habeas petition. His claims included ineffective assistance of trial counsel, insufficient evidence supporting a gang enhancement, and an alleged failure by the trial court to adequately answer a jury question concerning transferred intent. He also relied on post-verdict eyewitness testimony to argue actual innocence and self-defense, but the state trial court found that testimony not credible.

PROCEDURAL HISTORY

The magistrate judge recommended denying the § 2254 petition and dismissing the action with prejudice. The petitioner objected to findings that several claims were procedurally defaulted, that he had not shown cause and prejudice or actual innocence to excuse the default, and that the state courts' handling of a jury question was unreasonable. After conducting de novo review of the portions of the report to which objections were made, the district court accepted the report and recommendation, denied the petition, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Ayala v. Chappell, 829 F.3d 1081, 1095 (9th Cir. 2016)
- Walker v. Martin, 562 U.S. 307, 316 (2011)
- Martinez v. Ryan, 926 F.3d 1215, 1224 (9th Cir. 2019)
- Poland v. Stewart, 169 F.3d 573, 584 (9th Cir. 1999)
- Johnson v. Foster, 786 F.3d 501, 508 (7th Cir. 2015)
- Schlup v. Delo, 513 U.S. 298 (1995)
- United States v. Howell, 231 F.3d 615, 621 (9th Cir. 2000), cert. denied, 534 U.S. 831 (2001)

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