

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

FILED

09/10/2026

Clerk of the
Appellate Courts

MICHAEL EUGENE ST. CLAIR v. STATE OF TENNESSEE ET AL.

**Circuit Court for Williamson County
No. 24-CV-527**

No. M2025-00482-SC-R11-HC

ORDER

On December 11, 2002, Michael Eugene St. Clair (“the petitioner”) entered a guilty plea to one count of rape in Davidson County, Tennessee. Pursuant to the plea agreement, the petitioner received an eight-year sentence to be served on probation. The special conditions section of the judgment included “sex offender treatment” and “sex offender registry,” but the judgment did not include the condition of community supervision for life mandated by Tennessee Code Annotated section 39-13-524.

The petitioner ultimately violated his probation and was ordered to serve his sentence in confinement. On June 4, 2010, the petitioner was released from Tennessee Department of Correction custody. The petitioner completed the required sex offender registry, which specified that the petitioner had “no supervised release.” On August 16, 2010, however, the Davidson County Criminal Court entered a “Corrected Judgment,” which included community supervision for life as a special condition.

On September 20, 2024, the petitioner, a resident of Sumner County, filed a petition for a writ of habeas corpus in Williamson County, asserting that his liberty has been unlawfully restrained under a void judgment, citing the “Corrected Judgment.” The State moved to dismiss the petition, arguing that Williamson County was not the proper venue and that the petitioner had failed to include a copy of the guilty plea transcript. The habeas court granted the State’s motion to dismiss on those two procedural grounds.

The petitioner appealed, contending that the habeas court erred in dismissing the petition on the two procedural grounds. The Court of Criminal Appeals affirmed the habeas court’s dismissal of the petition on those two grounds. The court then concluded, sua sponte, that the petitioner would not be entitled to relief on the merits of his claim.

The petitioner has filed an application for permission to appeal to this Court pursuant to Rule 11 of the Tennessee Rule of Appellate Procedure. In the application, the petitioner maintains that the habeas court erred in dismissing his petition. The petitioner also argues that the Court of Criminal Appeals erred in addressing the merits of his petition despite affirming dismissal of the petition on the two procedural grounds addressed by the habeas court.

Upon consideration of the application for permission to appeal and the record before us, the application is granted in part and denied in part.

As to the portion of the opinion of the Court of Criminal Appeals that affirmed the habeas court's dismissal of the petition on the two procedural grounds, we deny the application for permission to appeal. Accordingly, we leave that portion of the opinion and judgment—and, therefore, the habeas court's dismissal of the petition—undisturbed. The denial of review as to the dismissal on the two procedural grounds is, to the extent authorized by law, without prejudice to refiling a compliant petition in a proper venue.

We summarily grant the application as to the limited issue of whether the Court of Criminal Appeals erred in addressing the merits of the petition. We conclude that we must vacate the portion of the opinion of the Court of Criminal Appeals that addressed the merits of the petition. Because the petition must be dismissed on the procedural grounds, it was not appropriate for the Court of Criminal Appeals to address the merits of the petition.

This order is designated for publication pursuant to Rule 4 of the Rules of the Tennessee Supreme Court.

PER CURIAM