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STATE OF MICHIGAN

COURT OF APPEALS

ANTONIO VALLIN BRIDGES,

Petitioner-Appellant,

v

BELLAMY CREEK CORRECTIONAL FACILITY WARDEN,

Respondent-Appellee.

UNPUBLISHED
November 13, 2026
11:27 AM

Nos. 376472; 378568
Ionia Circuit Court
LC Nos. 25-036861-AH;
2025-037134-AH

Before: O'BRIEN, P.J., and CAMERON and MALDONADO, JJ.

PER CURIAM.

In these consolidated appeals, petitioner appeals as of right the trial court's orders denying his petitions for a writ of habeas corpus. Petitioner argues that the trial court erred by denying him habeas relief because he was impermissibly labeled as a sex offender and denied parole for failing to complete sex offender treatment despite not being convicted of a sex offense, violating his right to due process. We affirm.

I. BACKGROUND

Petitioner is currently incarcerated at the Cooper Street Correctional Facility in Jackson, Michigan serving consecutive sentences. On December 16, 2015, petitioner was sentenced to concurrent terms of 30 to 120 months for each conviction after pleading guilty to three counts of false pretenses–$1,000 or more but less than $20,000, MCL 750.218(4)(a), as a third habitual offender, MCL 769.11, in the Ingham Circuit Court. Then, while on parole, on January 12, 2023, petitioner pleaded guilty in the Isabella Circuit Court to charges of malicious destruction of property worth between $1,000 and $20,000, as well as malicious destruction of fire or police property. Petitioner was sentenced to 13 months to 10 years for each conviction to be served consecutively to petitioner's original convictions. According to the Michigan Department of Correction's Offender Tracking Information System, petitioner's earliest release date was March 21, 2024, and his discharge date is July 30, 2035.

On April 11, 2025, petitioner filed a complaint for a writ of habeas corpus under state law. Despite his high probability of parole under the parole guidelines, petitioner alleged that the Parole

Board had improperly denied him parole. Although he had never been convicted of a sex offense, petitioner alleged that the Parole Board had labeled him a sex offender and required him to complete the Michigan Sex Offender Program before being eligible for parole. Petitioner further alleged that he had suffered negative consequences for refusing to participate in sex offender treatment, including being ineligible for parole, being taken off the Michigan Sexual Abuse Prevention Program (MSAPP) waitlist for 6 months, and being ineligible for unsecure level one housing or Special Alternative Incarceration (SAI) boot camp. Petitioner argued that he was entitled to a writ of habeas corpus because the Parole Board had acted in clear contravention of an express legal requirement and violated his constitutional right to due process, rendering the parole decision void. The trial court denied petitioner habeas relief, finding that he had not established a radical defect in jurisdiction that would render petitioner's convictions void nor any express legal requirement that the Parole Board act and grant him parole.

On November 17, 2025, petitioner filed a new complaint for a writ of habeas corpus largely reiterating his arguments that the Parole Board's labeling of him as a sex offender and requirement that he participate in sex offender treatment was unlawful. The trial court again denied petitioner habeas relief, noting that this was the second writ of habeas filed with the court in 2025 on the basis of being denied parole, and petitioner's fifth case in total filed with the court in 2025 on the issue. The trial court held that "[f]or the reasons set forth in those prior cases and under the principle of res judicata, Petitioner is precluded from obtaining relief."

These consolidated appeals followed.

II. STANDARDS OF REVIEW

A prisoner's right to file a complaint for a writ of habeas corpus is guaranteed by the Michigan Constitution. *Morales v Mich Parole Bd*, 260 Mich App 29, 40; 676 NW2d 221 (2003), citing Const 1963, art 1, § 12. Questions of constitutional law are reviewed de novo. *People v LeBlanc*, 465 Mich 575, 579; 640 NW2d 245 (2002). Issues of statutory interpretation are also reviewed de novo. *People v Carter*, 503 Mich 221, 226; 931 NW2d 566 (2019).

III. ANALYSIS

The writ of habeas corpus involves "a civil proceeding the main purpose of which is to cause the release of persons illegally confined, to inquire into the authority of law by which a person is deprived of liberty." *People v McCager*, 367 Mich 116, 121; 116 NW2d 205 (1962). Generally, MCL 600.4310(3) prohibits habeas relief to "[p]ersons convicted, or in execution, upon legal process, civil or criminal." *Moses v Dep't of Corrections*, 274 Mich App 481, 485-486; 736 NW2d 269 (2007). Habeas relief is available to a convicted person only in the narrow circumstance when "the convicting court was without jurisdiction to try the defendant for the crime in question." *Id*., quoting *People v Price*, 23 Mich App 663, 669-670; 179 NW2d 177 (1970). Moreover, "[a] radical defect in jurisdiction contemplates . . . an act or omission by state authorities that clearly contravenes an express legal requirement in existence at the time of the act or omission." *Price*, 23 Mich App at 671. A complaint for a writ of habeas corpus is not a substitute for direct appellate relief. *Id*. See also MCL 600.4310(3).

However, in the present case, petitioner does not argue that there is a radical defect rendering his convictions void; rather, petitioner argues that the Parole Board has violated the plea agreement in his case, his right to due process, and certain statutory requirements when denying him parole. A writ of habeas is not the proper means to bring this challenge. There is a distinction "between a challenge to the fact or duration of confinement . . . and an attack on the conditions of confinement." *Phillips v Warden, State Prison of Southern Michigan*, 153 Mich App 557, 565; 396 NW2d 482 (1986).

When the Parole Board abuses its discretion by ignoring statutory or constitutional requirements, the proper vehicle to ensure the Parole Board complies with its obligations is a writ of mandamus.[1] See *Adams v Parole Board*, 340 Mich App 251, 264-265; 985 NW2d 881 (2022). See also *Jones v Dep't of Corrections*, 468 Mich 646, 658; 664 NW2d 717 (2003) ("Where an official has a clear legal duty to act and fails to do so, the appropriate remedy is an order of mandamus.") In *Adams*, 340 Mich App at 256, after the plaintiff was denied parole, he filed a complaint for a writ of mandamus in the Court of Claims to compel the Parole Board to conduct another parole hearing. The plaintiff argued that the Parole Board had improperly considered acquitted conduct when it denied him parole, relying on *People v Beck*, 504 Mich 605, 626-627; 939 NW2d 213 (2019). The Court of Claims held that the mandamus action was an improper appeal from a parole decision and, given that the parole decision was discretionary, mandamus was inappropriate. *Adams*, 340 Mich App at 257.

This Court reversed the Court of Claims after carefully considering whether the appropriate remedy was a writ of habeas corpus or a writ of mandamus. *Id*. at 260-265. Though the decision of whether to grant parole is discretionary, this Court explained that this discretion is not unlimited and the factors the Parole Board could consider in making its decision were outlined by statute. Under MCL 791.233e(2)(e), the Parole Board was permitted to consider all "relevant factors . . . if not otherwise prohibited by law." Accordingly, this Court held that the Parole Board had a clear, legal duty "to comply with its statutory requirements and guidelines in exercising its discretion and issuing its parole decision," which included not considering acquitted conduct in violation of the Michigan Constitution. *Id*. at 262. And "[w]here an official has a clear legal duty to act and fails to do so, the appropriate remedy is an order of mandamus." *Id*. at 265, quoting *Jones*, 468 Mich at 658.

Like the plaintiff in *Adams*, petitioner argues that the Parole Board has violated his right to due process and, in effect, asks that this Court prohibit the Parole Board from requiring him to participate in sex offender treatment and render a new parole decision. Thus, the relief petitioner

[1] A writ of mandamus should issue only when:

> (1) the party seeking the writ has a clear legal right to performance of the specific duty sought, (2) the defendant has the clear legal duty to perform the act requested, (3) the act is ministerial and involves no exercise of discretion or judgment, and (4) no other remedy exists, legal or equitable, that might achieve the same result. [*Morales*, 260 Mich App at 41.]

seeks is the relief found appropriate in *Adams*, mandamus. Notably, petitioner is already seeking such relief with a contemporaneous action in the Court of Claims.

Petitioner's argument that the issues he raises render the Parole Board's decision void, entitling him to habeas relief is without merit. As discussed, the writ of habeas is intended "to cause the release of persons illegally confined, to inquire into the authority of law by which a person is deprived of liberty." *McCager*, 367 Mich at 121. Even if petitioner's argument that the Parole Board cannot require him to participate in sex offender treatment is correct, that would not mean that petitioner is being illegally confined or was entitled to parole. "[A] prisoner's release on parole is discretionary with the parole board." See MCL 791.234(11); *Adams*, 340 Mich at 261. Accordingly, habeas relief is inappropriate, and the trial court did not err in denying petitioner's complaints for a writ of habeas corpus.

Affirmed.

/s/ Colleen A. O'Brien
/s/ Thomas C. Cameron
/s/ Allie Greenleaf Maldonado