

NOTICE

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SLIP OPINION NO. 2026-OHIO-3661

THE STATE EX REL. BRADFORD v. OHIO BUREAU OF SENTENCE COMPUTATION.

[Until this opinion appears in the Ohio Official Reports advance sheets, it may be cited as *State ex rel. Bradford v. Bur. of Sentence Computation*, Slip Opinion No. 2026-Ohio-3661.]

Mandamus—Inmate has an adequate remedy in ordinary course of law by filing a motion in trial court to correct jail-time-credit award—Writ denied.

(No. 2026-0134—Submitted June 30, 2026—Decided September 23, 2026.)

IN MANDAMUS.

The per curiam opinion below was joined by KENNEDY, C.J., and FISCHER, DEWINE, BRUNNER, DETERS, HAWKINS, and SHANAHAN, JJ.

Per Curiam.

{¶ 1} Relator, Bradley L. Bradford, requests a writ of mandamus to compel respondent, the Bureau of Sentence Computation, to award him an additional 42

days of jail-time credit. We deny Bradford’s request because he has not shown that he lacks an adequate remedy in the ordinary course of the law.

BACKGROUND

{¶ 2} In 2016, the Cuyahoga County Court of Common Pleas sentenced Bradford in connection with three separate criminal cases. In the first case, No. CR-15-600941-A, Bradford was initially sentenced to 14 years in prison, but the Eighth District Court of Appeals reversed in part and remanded the case to the trial court for limited resentencing. *State v. Bradford*, 2017-Ohio-8481, ¶ 43. On remand, the trial court sentenced Bradford to 11 years in prison. In the second case, No. CR-14-584927-A, the trial court sentenced Bradford to one year in prison, noting in its entry that he was “to receive jail time credit for 359 day(s), to date.” In the third case, No. CR-15-595756-B, the trial court sentenced Bradford to a one-year prison term and noted in its entry that he was “to receive jail time credit for 401 day(s), to date.” The sentences in the latter two cases were to be served concurrently with the sentence in case No. CR-15-600941-A.

{¶ 3} On January 30, 2026, Bradford filed his complaint for a writ of mandamus, seeking to compel the bureau to award him with 42 additional days of jail-time credit. The bureau filed an answer to the complaint. On April 8, 2026, we granted an alternative writ, setting a schedule for the submission of evidence and briefs. 2026-Ohio-1248. The bureau submitted evidence consisting of an affidavit from Angela Dailey, assistant chief of the bureau, correspondence from Dailey showing the bureau’s determination of Bradford’s release date, and copies of Bradford’s sentencing entries and related indictments. Bradford filed a “response” to the bureau’s presentation of evidence, and both parties filed merit briefs.

ANALYSIS

{¶ 4} We will issue a writ of mandamus when the relator demonstrates, by clear and convincing evidence, a clear legal right to the requested relief, a clear

legal duty on the part of the respondent to provide the relief, and the absence of an adequate remedy in the ordinary course of the law. *State ex rel. Phelps v. McClelland*, 2020-Ohio-831, ¶ 11.

{¶ 5} Bradford contends that he has a clear legal right to receive, and that the bureau has a clear legal duty to provide, a “correc[t] appl[ication of] the total number of days of jail time credit properly calculated and ordered by the sentencing Court of 402 days, to include the extant 42 days the [bureau] refuses to apply.” Bradford insists that “all jail-time credit must be applied to each concurrent sentence.” To support his argument, Bradford relies primarily on *State v. Fugate*, in which we held that “[w]hen a defendant is sentenced to concurrent prison terms for multiple charges, jail-time credit pursuant to R.C. 2967.191 must be applied toward each concurrent prison term.” 2008-Ohio-856, syllabus.

{¶ 6} However, to obtain a writ of mandamus, Bradford must also prove that he lacks an adequate remedy in the ordinary course of the law. *Phelps* at ¶ 11. “Under R.C. 2929.19(B)(2)(g)(iii), the sentencing court retains jurisdiction to correct any error in a determination of jail-time credit.” *State ex rel. Duncan v. Chambers-Smith*, 2025-Ohio-978, ¶ 12. “The offender may, at any time after sentencing, file a motion in the sentencing court to correct any error made in making a determination [of jail-time credit], and the court may in its discretion grant or deny that motion.” R.C. 2929.19(B)(2)(g)(iii). Therefore, Bradford’s jail-time-credit claim can be asserted in a postsentence trial-court motion to correct the award of jail-time credit. Bradford thus has an adequate remedy in the ordinary course of the law, and he is not entitled to a writ of mandamus. *Duncan* at ¶ 12.

{¶ 7} We deny Bradford the requested relief because he has an adequate remedy in the ordinary course of the law by filing a motion in the trial court to correct the jail-time-credit award.

CONCLUSION

{¶ 8} For the foregoing reasons, we deny the writ of mandamus.

SUPREME COURT OF OHIO

Writ denied.

Bradley L. Bradford, pro se.

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T. Gatti, Assistant Attorneys General, for appellee.
