

Tatum v. State

At the punishment phase of trial, proof of a prior conviction was introduced. On appeal, the defendant challenged the validity of the prior conviction, stating that the judge had failed to warn him on the potential range of punishment. The defendant's argument reasoned that, since the prior conviction was invalid, introducing it during the punishment phase was reversible error. The court of appeals ultimately determined that although the defendant had not been warned directly by the judge, he had not established that he was otherwise unaware of the maximum possible punishment he faced. Holding that due process did not require judicial admonishments for misdemeanor defendants, the court found that the defendant had not proven he was unaware of the consequences of his plea, and that the plea was therefore not involuntary. Determining that the prior conviction was valid, the court upheld the sentence imposed in the subsequent case.