

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Corey A. Bullock v. Warden

Bullock v. Warden · No. 3:25-CV-379-TLS-AZ · Decided December 22, 2025

SUMMARY

The court denied Corey A. Bullock’s habeas petition challenging an Indiana prison disciplinary decision finding him guilty of possessing a cellphone and imposing a loss of earned credit time and demotion in credit class. The court held that the conduct report, witness statement, photograph, and related evidence satisfied the applicable “some evidence” standard, and that the denial of requested video evidence did not warrant relief.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Theresa L. Springmann
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	December 22, 2025
DOCKET	3:25-CV-379-TLS-AZ
DISPOSITION	denied
PROCEDURAL POSTURE	Petitioner sought federal habeas relief from an Indiana prison disciplinary conviction for possessing a cellphone, which resulted in the loss of 180 days of earned credit time and a demotion in credit class.
STANDARD OF REVIEW	A prison disciplinary finding satisfies due process if it is supported by some evidence in the record; the standard is lenient and requires no more than a modicum of evidence. The court does not reweigh the comparative weight of the evidence.
PRECEDENTIAL VALUE	unknown
PARTIES	Corey A. Bullock v. Warden

TOPICS

federal habeas corpus

prisoners rights

evidence

post-conviction relief

PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the prison disciplinary finding was supported by sufficient evidence for purposes of federal habeas review.
2. Whether the denial of Bullock's requested video-recording evidence violated his right to present documentary evidence in the prison disciplinary proceeding.
3. Whether Bullock could proceed in forma pauperis on appeal.

HOLDINGS

1. The disciplinary finding was supported by some evidence and therefore did not provide a basis for federal habeas relief.
2. The denial of the requested video-recording evidence was not a basis for habeas relief.
3. Bullock was denied leave to proceed in forma pauperis on appeal because an appeal could not be taken in good faith.

KEY QUOTATIONS

"[T]he findings of a prison disciplinary board [need only] have the support of some evidence in the record."

"Even meager proof will suffice, so long as the record is not so devoid of evidence that the findings of the disciplinary board were without support or otherwise arbitrary."

"[T]he inmate facing disciplinary proceedings should be allowed to call witnesses and present documentary evidence."

FACTUAL BACKGROUND

A disciplinary hearing officer at Indiana State Prison found Bullock guilty of possessing a cellphone in violation of Indiana Department of Correction Offense 121. The hearing officer imposed a loss of 180 days of earned credit time and a demotion in credit class. The record included a conduct report, a substantially similar witness statement, a photograph of the cellphone, and a video-recording summary. Bullock challenged the authenticity of the witness statement, the numbering on the evidence card, and the denial of access to video evidence.

PROCEDURAL HISTORY

Bullock filed a habeas petition challenging the disciplinary decision. The Warden responded with the administrative record and affidavits addressing the evidentiary challenges. The district court denied the petition, directed entry of judgment and closure of the case, and denied Bullock leave to proceed in forma pauperis on appeal.

DISPOSITION

denied

CASES CITED

- Webb v. Anderson, 224 F.3d 649, 652 (7th Cir. 2000)
- McPherson v. McBride, 188 F.3d 784, 786 (7th Cir. 1999)
- Wolff v. McDonnell, 418 U.S. 539, 566 (1974)
- Evans v. Circuit Court, 569 F.3d 665, 666 (7th Cir. 2009)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION COREY A. BULLOCK, Petitioner, v. CAUSE NO. 3:25-CV-379-TLS-AZ WARDEN, Respondent. OPINION AND ORDER Corey A. Bullock, a prisoner without a lawyer, filed a habeas petition challenging a disciplinary decision (ISP-24-10-2678) at the Indiana State Prison in which a disciplinary hearing officer (DHO) found him guilty of possessing a cellphone in violation of Indiana Department of Correction Offense 121.

Following a hearing, he was sanctioned with a loss one hundred eighty days of earned credit time and a demotion in credit class. Bullock argues that he is entitled to habeas relief because the administrative record lacks sufficient evidence to support a finding of guilt. [T]he findings of a prison disciplinary board [need only] have the support of some evidence in the record.

This is a lenient standard, requiring no more than a modicum of evidence. Even meager proof will suffice, so long as the record is not so devoid of evidence that the findings of the disciplinary board were without support or otherwise arbitrary.

Although some evidence is not much, it still must point to the accused's guilt. It is not our province to assess the comparative weight of the evidence underlying the disciplinary board's decision. Webb v. Anderson, 224 F.3d 649, 652 (7th Cir. 2000).

The administrative record contains a conduct report in which a Sergeant Nelson represented that when he approached a cell and pulled down the curtain, Bullock concealed his right hand behind his back. ECF 7-1. When correctional staff ordered him to cuff up, Bullock tried to smash a black cellphone. Id. The administrative record further contains a statement from Sergeant Nelson that substantially resembles the conduct report.

ECF 7-9. It contains a photograph of the cellphone. ECF 7-3. It contains a video recording summary that indicates that the investigator did not see anyone pick up a cellphone "off the range." ECF 7-10. It also contains the video recording itself, which the court has reviewed and

found consistent with the video recording summary. *Id.* The conduct report, witness statement, and the photograph constitute some evidence that Bullock possessed a cellphone.

Bullock takes issue with this evidence, contending that correctional staff fabricated Sergeant Nelson's signature on the witness statement and that the case number written on the evidence card associated with the cellphone did not match the number assigned to his disciplinary case.

However, the Warden submitted Sergeant Nelson's affidavit in which Sergeant Nelson attests to the legitimacy of his witness statement. ECF 7-11. The Warden also submitted an affidavit from Lieutenant Draper in which he explains that investigative staff assign numbers to evidence cards with a numbering system that is separate from the numbering system used to assigned to prison disciplinary proceedings and that, as a result, the numbers on evidence cards and disciplinary paperwork never match.

ECF 7-12. These explanations are undisputed. Moreover, the conduct report, by itself, is sufficient to satisfy the "some evidence" standard. See *McPherson v. McBride*, 188 F.3d 784, 786 (7th Cir. 1999). Therefore, the claim that the administrative record lacked sufficient evidence is not a basis for habeas relief. Bullock argues that he is entitled to habeas relief because correctional staff denied his request for video recording evidence.

He contends that correctional staff necessarily fabricated the video recording summary because surveillance recordings are saved for only 30 days and correctional staff said they reviewed the recording 49 days after the cellphone confiscation. "[T]he inmate facing disciplinary proceedings should be allowed to call witnesses and present documentary evidence." *Wolff v. McDonnell*, 418 U.S. 539, 566 (1974).

However, "[p]rison officials must have the necessary discretion to keep the hearing within reasonable limits and to refuse to call witnesses that may create a risk of reprisal or undermine authority, as well as to limit access to other inmates to collect statements or to compile other documentary evidence." *Id.* In response, the Warden submitted an affidavit from Lieutenant Draper, clarifying that surveillance recordings are preserved as a matter of course for 20 to 30 days but that they may be preserved longer if they have sufficient storage space or if it is review for disciplinary purposes.

ECF 7-12. Bullock does not dispute this explanation. Consequently, the denial of evidence is not a basis for habeas relief. Because Bullock has not asserted a valid claim for habeas relief, the habeas petition is denied. If Bullock wants to appeal this decision, he does not need a certificate of appealability because he is challenging a prison disciplinary proceeding.

See *Evans v. Circuit Court*, 569 F.3d 665, 666 (7th Cir. 2009). However, he may not proceed in forma pauperis on appeal because the court finds pursuant to 28 U.S.C. § 1915(a)(3) that an appeal in this case could not be taken in good faith.

For these reasons, the court: (1) DENIES the habeas petition (ECF 1); (2) DIRECTS the clerk to enter judgment and close this case; and (3) DENIES Corey A. Bullock leave to proceed in forma pauperis on appeal. SO ORDERED on December 22, 2025. s/ Theresa L. Springmann JUDGE THERESA L. SPRINGMANN UNITED STATES DISTRICT COURT