

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

United States v. Aaron Lyons

No. 24-2740 (3d Cir. Apr. 28, 2026) · No. No. 24-2740 · Decided April 28, 2026

SUMMARY

The U.S. Court of Appeals for the Third Circuit affirmed the denial of Aaron Lyons’s 28 U.S.C. § 2255 motion challenging his conviction under 18 U.S.C. § 922(g)(1). The court held that Lyons’s Rehaif-based claim was procedurally defaulted because the claim’s legal basis was reasonably available when he pleaded guilty, and that he could not establish actual innocence. The court also upheld the denial of an evidentiary hearing because the record conclusively showed that Lyons knew his qualifying conviction status.

CASE DETAILS

COURT	United States Court of Appeals for the Third Circuit
WRITING FOR THE COURT	Judge Bibas; Judge Shwartz; Judge Phipps
JURISDICTION	U.S. Court of Appeals for the Third Circuit
DECIDED	April 28, 2026
DOCKET	No. 24-2740
DISPOSITION	affirmed
PROCEDURAL POSTURE	Lyons appealed the Western District of Pennsylvania's dismissal of his 28 U.S.C. § 2255 motion challenging his federal felon-in-possession conviction. He argued that his Rehaif claim was sufficiently novel to excuse procedural default and that he was actually innocent, requiring an evidentiary hearing.
STANDARD OF REVIEW	The court reviewed the District Court's legal ruling on procedural default de novo and its denial of an evidentiary hearing for abuse of discretion.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Aaron Lyons v. United States of America

TOPICS

- federal habeas corpus
- post-conviction relief
- criminal procedure
- appellate procedure
- statutory interpretation

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Criminal procedure

Appellate procedure

QUESTIONS PRESENTED

1. Whether the novelty of Lyons's Rehaif claim constituted cause to excuse his procedural default under § 2255.
2. Whether Lyons could overcome procedural default by establishing actual innocence based on an alleged lack of knowledge of his qualifying conviction status.
3. Whether the District Court abused its discretion by denying an evidentiary hearing on the actual-innocence claim.
4. Whether the court retained jurisdiction over the collateral challenge after Lyons completed his prison term and supervised release.

HOLDINGS

1. A legal claim is not sufficiently novel to establish cause for procedural default when its conceptual and legal building blocks were reasonably available to counsel, even if controlling lower-court precedent uniformly rejected the claim at the time.
2. Lyons could not overcome procedural default through actual innocence because the record conclusively showed that he knew his qualifying conviction status when he possessed the firearm.
3. A § 2255 court need not hold an evidentiary hearing when the motion, files, and records conclusively show that the movant is entitled to no relief; conclusory and record-contradicted assertions do not require a hearing.
4. Completion of imprisonment and supervised release does not eliminate jurisdiction over a collateral challenge to the underlying conviction because collateral consequences are presumed.

KEY QUOTATIONS

“Because Lyons defaulted the argument, and because the record forecloses his claim of actual innocence, we will AFFIRM the District Court’s dismissal.” (3)

“One is when trial counsel falls below the Sixth Amendment’s guarantee of effective assistance of counsel.” (4)

“Where the basis of a ... claim is available, and other defense counsel have perceived and litigated that claim, the demands of ... finality counsel against treating a lawyer’s ignorance of an objection as cause for a procedural default.” (5)

“Similarly, the cause inquiry for Lyons must focus on whether his claim’s basis was “available,” not whether litigating it “would have been futile” at the time.” (7)

“Because Lyons knew his conviction status, the District Court properly denied him an evidentiary hearing on actual innocence.” (11)

FACTUAL BACKGROUND

Lyons pleaded guilty in Pennsylvania state court to possessing an offensive weapon after police found him with a gun at an elementary-school playground. At the plea colloquy, the state judge told him that the offense was punishable by five years in prison and that his conviction meant he could not possess a gun; Lyons said he understood. After completing probation, Lyons was found with a loaded pistol, pleaded guilty to being a felon in possession under 18 U.S.C. § 922(g)(1), and later sought collateral relief based on Rehaif's requirement that the defendant know his qualifying conviction status.

PROCEDURAL HISTORY

Lyons pleaded guilty to violating 18 U.S.C. § 922(g)(1) and was sentenced. He voluntarily dismissed a direct appeal that raised a Second Amendment issue. After *Rehaif v. United States* held that the government must prove the defendant knew of his qualifying conviction status, Lyons filed a § 2255 motion asserting that his plea was unknowing and involuntary. The District Court rejected his procedural-default and actual-innocence arguments without an evidentiary hearing, and the Third Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- *Rehaif v. United States*, 588 U.S. 225, 237 (2019)
- *United States v. Huet*, 665 F.3d 588, 596 (3d Cir. 2012)
- *United States v. Hill*, 98 F.4th 473, 482-83 (3d Cir. 2024)
- *United States v. Juvenile Male*, 564 U.S. 932, 936 (2011) (per curiam)
- *Hodge v. United States*, 554 F.3d 372, 377 (3d Cir. 2009)
- *United States v. Arrington*, 13 F.4th 331, 334 (3d Cir. 2021)
- *Coleman v. Thompson*, 501 U.S. 722, 753 (1991)
- *Murray v. Carrier*, 477 U.S. 478, 488 (1986)
- *Cuyler v. Sullivan*, 446 U.S. 335, 344 (1980)
- *Strickland v. Washington*, 466 U.S. 668, 687 (1984)
- *Reed v. Ross*, 468 U.S. 1, 14-18 (1984)
- *Engle v. Isaac*, 456 U.S. 107, 130 n.35, 134 (1982)
- *Bousley v. United States*, 523 U.S. 614, 617, 622-24 (1998)
- *Bailey v. United States*, 516 U.S. 137, 150 (1995)
- *United States v. Pollard*, 20 F.4th 1252, 1262 (9th Cir. 2021) (R. Nelson, J., concurring)
- *United States v. Ford*, 821 F.3d 63, 71 (1st Cir. 2016)
- *United States v. Games-Perez*, 667 F.3d 1136, 1145 (10th Cir. 2012) (Gorsuch, J., concurring)
- *United States v. Reyes*, 194 F. App'x 69, 70 (2d Cir. 2006)

- United States v. Langley, 62 F.3d 602, 613-19 (4th Cir. 1995) (Phillips, J., concurring in part and dissenting in part)
- Greer v. United States, 593 U.S. 503, 511-12 (2021)
- United States v. Frady, 456 U.S. 152, 166 (1982)
- United States v. De Castro, 49 F.4th 836, 842, 844-46 (3d Cir. 2022)
- Mullaney v. Wilbur, 421 U.S. 684 (1975)
- United States v. Johnson, United States v. Johnson, 457 U.S. 537, 551 (1982)
- Griffith v. Kentucky, 479 U.S. 314, 326 (1987)
- Kirtsaeng v. John Wiley & Sons, Inc., 568 U.S. 519, 548 (2013)
- United States v. Vargas-Soto, 35 F.4th 979, 997 (5th Cir. 2022)
- Gatewood v. United States, 979 F.3d 391, 395-96 (6th Cir. 2020)
- Daniels v. United States, 254 F.3d 1180, 1191 (10th Cir. 2001) (en banc)
- Simpson v. Matesanz, 175 F.3d 200, 212 (1st Cir. 1999)
- Boyer v. United States, 55 F.3d 296, 299 (7th Cir. 1995)
- United States v. Moss, 252 F.3d 993, 1002 (8th Cir. 2001)
- United States v. Werle, 35 F.4th 1195, 1200-01 (9th Cir. 2022)
- United States v. Roberson, 194 F.3d 408, 411, 414 (3d Cir. 1999)
- Schlup v. Delo, 513 U.S. 298, 321 (1995)
- United States v. Dawson, 857 F.2d 923, 927 (3d Cir. 1988)

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