

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Cameron Harris v. United States of America

No. 2:24-CV-00041-DCLC-CRW · No. No. 2:24-CV-00041-DCLC-CRW · Decided December 1, 2025

SUMMARY

The United States District Court for the Eastern District of Tennessee denied Cameron Harris’s initial and amended motions under 28 U.S.C. § 2255 to vacate, set aside, or correct his sentence. The court held that Harris’s guilty plea was knowing and voluntary despite the court’s failure to advise him about sex-offender registration, because registration is a collateral consequence. The court also rejected his ineffective-assistance claim and declined to issue a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Clifton L. Corker
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	December 1, 2025
DOCKET	No. 2:24-CV-00041-DCLC-CRW
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner moved under 28 U.S.C. § 2255 to vacate, set aside, or correct his federal sentence, and filed an amended motion. The district court denied both motions and declined to issue a certificate of appealability.
STANDARD OF REVIEW	Collateral relief under § 2255 is limited to constitutional or jurisdictional errors, sentences outside statutory limits, or fundamental errors resulting in a complete miscarriage of justice. The petitioner bears the burden of establishing entitlement to relief. Conclusory allegations are insufficient, and no evidentiary hearing is required when the motion and the record conclusively show that the petitioner is not entitled to relief. For ineffective assistance, Strickland requires deficient performance and prejudice; in the guilty-plea context, prejudice requires a reasonable probability that the defendant would have rejected the plea and proceeded to trial. A certificate of appealability requires a substantial showing of the denial of a constitutional right.

PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive value only
PARTIES	Cameron Harris v. United States of America

TOPICS

federal habeas corpus post-conviction relief ineffective assistance plea bargaining sentencing

PRACTICE AREAS

federal post-conviction litigation criminal procedure ineffective assistance of counsel guilty pleas
sentencing

QUESTIONS PRESENTED

1. Whether Harris's guilty plea was unknowing and involuntary because the district court did not advise him that he would be required to register as a sex offender.
2. Whether counsel rendered ineffective assistance by failing to challenge the sufficiency of the evidence, investigate or argue Harris's alleged innocence, and advise him regarding the charged offense.
3. Whether Harris was entitled to a certificate of appealability after denial of his § 2255 claims.

HOLDINGS

1. Sex-offender registration is a collateral consequence of a guilty plea, not a direct consequence, because the registration obligation is controlled by state and federal law rather than by the district court. The court therefore was not constitutionally required to advise Harris about registration for his plea to be valid.
2. Harris failed to establish ineffective assistance of counsel. His knowing and voluntary guilty plea, sworn admissions to the factual basis, stipulation that the evidence satisfied the child-pornography definition, and failure to show that rejecting the plea would have been rational defeated both the deficient-performance and prejudice requirements.
3. The court declined to issue a certificate of appealability because Harris did not make a substantial showing of the denial of a constitutional right and reasonable jurists would not find the court's rejection of his claims debatable or wrong.

KEY QUOTATIONS

“A defendant, however, “need only be aware of the direct consequences of the plea,” and a district court “is under no constitutional obligation to inform the defendant of all the possible collateral consequences of the plea.”” (Section III.A)

“His “[s]olemn declarations in open court carry a strong presumption of verity,” and his declarations, as well as the Court’s findings, “constitute a formidable barrier in any subsequent collateral proceeding.”” (Section III.B)

“The test is objective, not subjective; and thus, ‘to obtain relief on this type of claim, a petitioner must convince the court that a decision to reject the plea bargain would have been rational under the circumstances.’” (Section III.B)

“As the petitioner under § 2255, Mr. Harris fails to meet his burden of establishing that his conviction and sentence are in violation of the Constitution, or that a fundamental defect resulted in a complete miscarriage of justice or an egregious error.” (Section IV)

FACTUAL BACKGROUND

In 2021, law enforcement received a CyberTip concerning child-pornography files sent to Harris's email account. Harris admitted that he had produced two videos secretly recording a prepubescent minor in bathrooms and had used a cellphone to search for, receive, and transmit child pornography. He pleaded guilty to receiving child pornography after stipulating that the factual basis was true and that the images and videos met the statutory definition of child pornography. The court imposed a 144-month sentence after dismissing the remaining indictment counts pursuant to the plea agreement.

PROCEDURAL HISTORY

A federal grand jury indicted Harris on multiple child-exploitation and child-pornography charges. He pleaded guilty to receiving child pornography under 18 U.S.C. § 2252A(a)(2)(A) and (b)(1), the remaining charges were dismissed under the plea agreement, and he received a 144-month sentence. He did not appeal and later sought § 2255 relief, alleging ineffective assistance of counsel and that his guilty plea was unknowing and involuntary because he was not advised of sex-offender-registration requirements.

DISPOSITION

other

CASES CITED

- United States v. Frady, 456 U.S. 152, 162-66 (1982)
- Hampton v. United States, 191 F.3d 695, 698 (6th Cir. 1999)
- United States v. Addonizio, 442 U.S. 178, 184-85 (1979)
- Custis v. United States, 511 U.S. 485, 497 (1994)
- Parke v. Raley, 506 U.S. 20, 29 (1992)
- Pough v. United States, 442 F.3d 959, 964 (6th Cir. 2006)
- Watson v. United States, 165 F.3d 486, 488 (6th Cir. 1999)
- Reed v. Farley, 512 U.S. 339, 354 (1994)
- Green v. Wingo, 454 F.2d 52, 53 (6th Cir. 1972)
- Jefferson v. United States, 730 F.3d 537, 547 (6th Cir. 2013)
- Smith v. United States, 348 F.3d 545, 550 (6th Cir. 2003)
- Fontaine v. United States, 411 U.S. 213, 215 (1973)

- Ruelas v. Wolfenbarger, 580 F.3d 403, 408 (6th Cir. 2009)
- Brady v. United States, 397 U.S. 742, 748-50 (1970)
- Bousley v. United States, 523 U.S. 614, 618 (1998)
- El-Nobani v. United States, 287 F.3d 417, 421 (6th Cir. 2002)
- United States v. Rodriguez-Gonzales, 543 F. App'x 532, 533 (6th Cir. 2013)
- Maleng v. Cook, 490 U.S. 488, 491-92 (1989)
- United States v. Cottle, 355 F. App'x 18, 20-21 (6th Cir. 2009)
- Ward v. State, 315 S.W.3d 461, 464 (Tenn. 2010)
- Strickland v. Washington, 466 U.S. 668, 687-94 (1984)
- Hill v. Lockhart, 474 U.S. 52, 58-59 (1985)
- Tollett v. Henderson, 411 U.S. 258, 267 (1973)
- United States v. Martin, 526 F.3d 926, 932 (6th Cir. 2008)
- Padilla v. Kentucky, 559 U.S. 356, 371-72 (2010)
- Jones v. Bell, 801 F.3d 556, 562 (6th Cir. 2015)
- Davila v. United States, 258 F.3d 448, 451 (6th Cir. 2001)
- Blackledge v. Allison, 431 U.S. 63, 74 (1977)
- United States v. Timmreck, 441 U.S. 780, 784 (1979)
- Luster v. United States, 168 F.3d 913, 916 (6th Cir. 1999)
- Mapes v. Coyle, 171 F.3d 408, 427 (6th Cir. 1999)
- United States v. Vargas-Gutierrez, 464 F. App'x 492, 496 (6th Cir. 2012)
- United States v. Shah, 453 F.3d 520, 523 (D.C. Cir. 2006)
- Pilla v. United States, 668 F.3d 368, 373 (6th Cir. 2012)
- Shimel v. Warren, 838 F.3d 685, 698 (6th Cir. 2016)
- Moore v. United States, 676 F. App'x 383, 385 (6th Cir. 2017)
- Ellis v. United States, No. 19-6047, 2020 WL 1272625, at *3 (6th Cir. Jan. 30, 2020)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)