

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Sean Stone v. Warden

Stone v. Warden · No. 3:25-CV-782-GSL-APR · Decided February 19, 2026

SUMMARY

The United States District Court for the Northern District of Indiana denied Sean Stone’s habeas corpus petition challenging a prison disciplinary conviction for possessing a cell phone. The court held that Stone received adequate notice and procedural protections, that some evidence supported the conviction, and that the alleged deficiencies concerning evidence, lay advocacy, and impartiality did not establish a due process violation.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	February 19, 2026
DOCKET	3:25-CV-782-GSL-APR
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal habeas petition under 28 U.S.C. § 2254 challenging a prison disciplinary conviction that resulted in the loss of earned credit time.
STANDARD OF REVIEW	Federal habeas review of a prison disciplinary proceeding requires compliance with the procedural protections of the Fourteenth Amendment and asks whether the disciplinary decision is supported by some evidence. The court does not reweigh evidence or independently determine guilt.
PRECEDENTIAL VALUE	Unpublished district court opinion; limited persuasive value
PARTIES	Sean Stone v. Warden

TOPICS

- federal habeas corpus
- prisoners rights
- procedural due process
- due process
- evidence

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether alleged untimely screening under the Indiana Department of Correction disciplinary code warranted federal habeas relief.
2. Whether Stone was denied due process through the absence of a purported additional witness statement or unavailable surveillance and body-camera footage.
3. Whether Stone received constitutionally adequate notice of the disciplinary charge.
4. Whether some evidence supported the disciplinary finding that Stone possessed a cell phone.
5. Whether the performance of Stone's lay advocate violated due process.
6. Whether the hearing officer was impermissibly biased and denied Stone an impartial decisionmaker.

HOLDINGS

1. An alleged failure to comply with the Indiana Department of Correction's internal screening deadline does not provide a basis for federal habeas relief because federal habeas relief is unavailable for errors of state law or prison policy absent a federal constitutional violation.
2. Stone was not denied due process because the requested witness statement was obtained and considered, and the requested surveillance and body-camera footage did not exist.
3. Stone received constitutionally adequate notice because he was notified more than 24 hours before the hearing and the conduct report identified the charged rule and summarized the facts supporting the charge.
4. The disciplinary conviction was supported by some evidence and therefore satisfied due process.
5. Stone's dissatisfaction with his lay advocate did not establish a due process violation because a lay advocate is constitutionally required only when the inmate is illiterate or the case is unusually complex, and neither condition was present.
6. The hearing officer was not shown to be impermissibly biased because the record did not indicate substantial involvement in the underlying incident, and declining to credit a witness's statement did not establish bias.

KEY QUOTATIONS

"When prisoners lose earned credit time in a disciplinary proceeding, the Fourteenth Amendment Due Process Clause guarantees them certain procedural protections"

"To satisfy due process, there also must be "some evidence" to support the hearing officer's decision."

"The "some evidence" test "is a lenient standard, requiring no more than a modicum of evidence.""

"The Federal Constitution does not require evidence that logically precludes any conclusion but the one reached by the disciplinary board."

FACTUAL BACKGROUND

During a random shakedown at Westville Correctional Facility, a sergeant found a cell phone and charger in a bed Stone was occupying, along with Stone's prison identification card. Stone denied owning the phone and obtained a statement from another inmate claiming that the phone belonged to him; requested surveillance and body-camera footage was unavailable. After a disciplinary hearing, Stone was found guilty and lost 30 days of earned credit time.

PROCEDURAL HISTORY

Stone was found guilty in a Westville Correctional Facility disciplinary proceeding of possessing a cell phone and was sanctioned with the loss of 30 days of earned credit time. After his administrative appeals were denied, he filed a federal habeas petition. The Warden responded, Stone replied, and the district court denied the petition and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Wolff v. McDonnell, 418 U.S. 539 (1974)
- Superintendent, Mass. Corr. Inst. v. Hill, 472 U.S. 445, 455 (1985)
- Estelle v. McGuire, 502 U.S. 62, 67–68 (1991)
- Keller v. Donahue, 271 F. App'x 531, 532 (7th Cir. 2008)
- Piggie v. Cotton, 342 F.3d 660, 666 (7th Cir. 2003)
- Northern v. Hanks, 326 F.3d 909, 910–11 (7th Cir. 2003)
- Webb v. Anderson, 224 F.3d 649, 652 (7th Cir. 2000)
- McPherson v. McBride, 188 F.3d 784, 786 (7th Cir. 1999)
- Meeks v. McBride, 81 F.3d 717, 721 (7th Cir. 1996)
- Moffat v. Broyles, 288 F.3d 978, 981–82 (7th Cir. 2002)
- Eichwedel v. Chandler, 696 F.3d 660, 675 (7th Cir. 2012)
- Hamilton v. O'Leary, 976 F.2d 341, 346 (7th Cir. 1992)
- Santonio House v. Daniels, 637 F. App'x 950 (7th Cir. 2016)
- Miller v. Duckworth, 963 F.2d 1002, 1004 (7th Cir. 1992)
- Cutler v. Warden, No. 3:17-CV-477-RLM-MGG, 2018 WL 4468963, at *3 (N.D. Ind. Sept. 18, 2018)
- Prude v. Meli, 76 F.4th 648, 657 (7th Cir. 2023)
- Johnson v. Finnan, 467 F.3d 693, 695 (7th Cir. 2006)
- Liteky v. United States, 510 U.S. 540, 555 (1994)