

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, HAMMOND DIVISION

Castro v. Warden

Cause No. 2:24-CV-379-PPS-JEM · No. Cause No. 2:24-CV-379-PPS-JEM · Decided January 13, 2026

SUMMARY

The United States District Court for the Northern District of Indiana denied Matthew David Castro’s petition for a writ of habeas corpus under 28 U.S.C. § 2254. The court rejected his ineffective-assistance claims concerning jury instructions on voluntary manslaughter, an instruction regarding witness truthfulness, and juror questioning of witnesses, concluding that the state courts’ decisions were not contrary to or an unreasonable application of clearly established federal law.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Hammond Division
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	January 13, 2026
DOCKET	Cause No. 2:24-CV-379-PPS-JEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2254 alleging ineffective assistance of trial counsel and related trial-court error following an Indiana murder conviction.
STANDARD OF REVIEW	Under 28 U.S.C. § 2254(d), habeas relief is available only when the state-court adjudication was contrary to, or involved an unreasonable application of, clearly established Supreme Court precedent, or was based on an unreasonable determination of the facts. Ineffective assistance claims are governed by Strickland v. Washington, requiring deficient performance and resulting prejudice. State-law determinations underlying an ineffective-assistance claim are generally unreviewable on federal habeas review.
PRECEDENTIAL VALUE	Unknown; federal district court opinion with no reporter citation identified in the source.

TOPICS

federal habeas corpus

ineffective assistance

post-conviction relief

sixth amendment

jury instructions

PRACTICE AREAS

federal habeas corpus

post-conviction relief

criminal procedure

constitutional law

QUESTIONS PRESENTED

1. Whether trial counsel was ineffective for failing to request a voluntary-manslaughter jury instruction.
2. Whether trial counsel was ineffective for failing to object to a preliminary jury-selection instruction stating that the jury should attempt to fit the evidence to the theory that every witness was telling the truth.
3. Whether trial counsel was ineffective for failing to object to the manner and substance of juror questioning of a witness.
4. Whether the related claims challenging the trial court's juror-questioning procedure were procedurally defaulted or otherwise warranted federal habeas relief.

HOLDINGS

1. The state courts reasonably rejected Castro's ineffective-assistance claim because the record did not contain appreciable evidence of sudden heat, a voluntary-manslaughter instruction would have been improper under Indiana law, and counsel's decision was also reasonably viewed as consistent with his strategy of arguing that Castro did not kill Overton or did not intend to kill him.
2. The state court reasonably rejected the ineffective-assistance claim because the instruction, considered together with the presumption-of-innocence, burden-of-proof, and witness-credibility instructions, did not undermine the fairness of the trial, and Castro could not establish Strickland prejudice.
3. The state court reasonably rejected Castro's ineffective-assistance claim because the juror's question was read by the judge rather than asked orally, counsel had no reasonable opportunity to object before the question was read, and counsel had a reasonable strategic basis for declining to object afterward.
4. Castro's general challenge to the practice of allowing jurors to question witnesses was procedurally defaulted because he did not present it to the state courts. His challenge to the absence of a sidebar was considered but failed because the isolated reference to murder did not affect the verdict.

KEY QUOTATIONS

"Obtaining habeas relief is a tall order. This is because such relief only "exists as a guard against extreme malfunctions in the state criminal justice systems, not a substitute for ordinary error correction through appeal."" (Discussion)

“I agree that the preliminary instruction given in this case—that witnesses are presumed to speak the truth—is problematic and should probably be retired by the state judiciary.” (Discussion § 2)

“For these reasons, the court DENIES the habeas corpus petition (ECF 1); DENIES a certificate of appealability pursuant to Section 2254 Habeas Corpus Rule 11; and DIRECTS the clerk to enter judgment in favor of the Respondent and against the Petitioner.” (Disposition)

FACTUAL BACKGROUND

Matthew David Castro and Michael Overton, Castro's best friend and roommate, were together in Castro's apartment on March 21, 2021. After neighbors reported loud noises, police found Overton dead from multiple blunt-force injuries and found Castro injured, intoxicated, emotional, and making statements indicating that he had killed or beaten someone. Castro was charged with murder and convicted after the trial court declined to give an involuntary-manslaughter instruction; the jury also received instructions concerning the presumption of innocence, witness credibility, and juror questioning.

PROCEDURAL HISTORY

Castro was convicted of murder in Porter County, Indiana Superior Court. The Indiana Court of Appeals rejected his ineffective-assistance claims on direct appeal. Castro then filed this federal § 2254 petition, which the district court denied and dismissed with judgment for the respondent; the court also denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Castro v. State, 241 N.E.3d 612 (Ind. Ct. App. 2024)
- Woods v. Donald, 575 U.S. 312, 316 (2015)
- Rose v. Clark, 478 U.S. 570, 579 (1986)
- Wiggins v. Smith, 539 U.S. 510, 520-21 (2003)
- Harrington v. Richter, 562 U.S. 86, 101, 112 (2011)
- Strickland v. Washington, 466 U.S. 668, 689-90, 694 (1984)
- McNary v. Lemke, 708 F.3d 905, 914 (7th Cir. 2013)
- Massey v. State, 955 N.E.2d 247, 255 (Ind. Ct. App. 2011)
- Roberson v. State, 982 N.E.2d 452, 456-57 (Ind. Ct. App. 2013)
- Clark v. State, 834 N.E.2d 153, 158 (Ind. Ct. App. 2005)
- Watts v. State, 885 N.E.2d 1228, 1232-33 (Ind. 2008)
- Griffin v. State, 644 N.E.2d 561, 564 (Ind. 1994)
- Rogers v. Wells, 96 F.4th 1006, 1012 (7th Cir. 2024)
- Lopez v. Thurmer, 59 F.3d 584, 587 (7th Cir. 2010)
- United States v. Hall, 854 F.2d 1036, 1039-41 (7th Cir. 1988)

- Cupp v. Naughten, 414 U.S. 141 (1973)
- Woodford v. Ngo, 548 U.S. 81, 93 (2006)
- Thomas v. Williams, 822 F.3d 378, 384 (7th Cir. 2016)
- United States v. Sykes, 614 F.3d 303, 312-14 (7th Cir. 2010)
- S.E.C. v. Koenig, 557 F.3d 736, 741-43 (7th Cir. 2009)
- United States v. Feinberg, 89 F.3d 333, 336-38 (7th Cir. 1996)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)

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