

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

David E. Fields v. United States of America

Fields · No. Civil No. 25-cv-01969-JPG; Criminal No. 08-cr-30058-JPG-1 · Decided March 24, 2026

SUMMARY

The court denies David Fields’s motion to reconsider its prior dismissal of Grounds 2 and 4 of his 28 U.S.C. § 2255 motion. It concludes that United States v. Thompson and United States v. Haymond do not provide a compelling basis for reconsideration and that Fields’s Double Jeopardy and supervised-release arguments are foreclosed by applicable law.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	J. Phil Gilbert
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 24, 2026
DOCKET	Civil No. 25-cv-01969-JPG; Criminal No. 08-cr-30058-JPG-1
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner moved for reconsideration of the district court's prior order denying relief on Grounds 2 and 4 of his 28 U.S.C. § 2255 motion.
STANDARD OF REVIEW	Reconsideration of a prior ruling in the same litigation is governed by the discretionary law-of-the-case doctrine and is appropriate only for a compelling reason, such as a misunderstanding of a party, decision outside the adversarial issues, an error of apprehension, a significant change in law, or significant new facts.
PRECEDENTIAL VALUE	unpublished
PARTIES	David E. Fields v. United States of America

TOPICS

- post-conviction relief
- double jeopardy
- sentencing
- fifth amendment
- criminal procedure

PRACTICE AREAS

- federal post-conviction
- criminal procedure
- sentencing

QUESTIONS PRESENTED

1. Whether the court should reconsider its prior denial of relief on Grounds 2 and 4 of Fields's § 2255 motion under the law-of-the-case doctrine.
2. Whether revocation of supervised release constitutes punishment for purposes of the Double Jeopardy Clause.
3. Whether a sentencing court may impose supervised release as part of a sentence after a term of imprisonment, such that the defendant has not completed the sentence until supervised release is completed.

HOLDINGS

1. Reconsideration was not warranted because Fields identified no compelling reason to reopen the court's prior decision.
2. Revocation of supervised release does not constitute punishment for the conduct triggering revocation or an additional punishment for the original offense; it sanctions the defendant's breach of trust and therefore does not violate double jeopardy on that basis.
3. A term of imprisonment and a term of supervised release imposed under 18 U.S.C. § 3583(a) are components of a single sentence; a defendant has not completed the sentence until the supervised-release term is completed and is entitled only to conditional liberty before then.

KEY QUOTATIONS

“The law of the case is a discretionary doctrine that creates a presumption against reopening matters already decided in the same litigation and authorizes reconsideration only for a compelling reason such as where the court has misunderstood a party, where the court has made a decision outside the adversarial issues presented to the court by the parties, where the court has made an error of apprehension (not of reasoning), where a significant change in the law has occurred, or where significant new facts have been discovered.” (2)

“Revocation of supervised release is neither a punishment for the conduct that triggered the revocation nor an additional punishment for the original offense.” (2)

“when a defendant violates the terms of supervised release, it is the defendant’s breach of trust in failing to abide by those terms that is sanctioned.” (2)

“Accordingly, if a sentencing court decides to impose supervised release, the term of imprisonment and the term of supervised release are part of one single sentence.” (3)

FACTUAL BACKGROUND

Fields challenged the revocation and terms of his supervised release in his § 2255 motion. Ground 2 asserted that revocation of supervised release violated the Double Jeopardy Clause, while Ground 4 asserted that the court lacked authority to condition his release after he completed his prison term and received no leniency. The court concluded that revocation sanctions a breach of trust and that imprisonment and supervised release constitute components of a single sentence.

PROCEDURAL HISTORY

The court previously entered a Memorandum and Order on February 13, 2026, concluding that Fields was not entitled to relief on Grounds 2 and 4 of his § 2255 motion. Fields moved for reconsideration, arguing that the authorities relied upon in the prior order were dicta and that *United States v. Thompson* and *United States v. Haymond* supported reinstatement of his claims. The court denied reconsideration.

DISPOSITION

other

CASES CITED

- *Christianson v. Colt Indus. Operating Corp.*, 486 U.S. 800, 817 (1988)
- *Santamarina v. Sears, Roebuck & Co.*, 466 F.3d 570, 571-72 (7th Cir. 2006)
- *Bank of Waunakee v. Rochester Cheese Sales, Inc.*, 906 F.2d 1185, 1191 (7th Cir. 1990)
- *United States v. Thompson*, 777 F.3d 368 (7th Cir. 2015)
- *United States v. Haymond*, 588 U.S. 634 (2019)
- *United States v. Carpenter*, 104 F.4th 655, 660 (7th Cir. 2024)
- *United States v. McIntosh*, 630 F.3d 699, 703 (7th Cir. 2011)
- *United States v. Wyatt*, 102 F.3d 241, 245 (7th Cir. 1996)
- *United States v. Huusko*, 275 F.3d 600, 603 (7th Cir. 2001)
- *United States v. Villasenor*, 256 F. App'x 842, 844 (7th Cir. 2007)
- *United States v. Boultinghouse*, 784 F.3d 1163, 1171 (7th Cir. 2015)

OPINION

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS
DAVID E. FIELDS, Petitioner, Civil No. 25-cv-01969-JPG v. Criminal No 08-cr-30058-JPG-1
UNITED STATES OF AMERICA, Respondent. MEMORANDUM AND ORDER This case is before the Court on Petitioner David Fields's Motion for Reconsideration (Doc. 7). Petitioner asks the Court to reconsider its Memorandum and Order, entered February 13, 2026, which concluded that he is not entitled to relief on Grounds 2 and 4 of his § 2255 motion.

He argues that reconsideration is warranted because the citations the Court used to dismiss the claims “were dicta, and not a proper basis for denial.” He contends that *United States v. Thompson*, 777 F.3d 368 (7th Cir. 2015) and *United States v. Haymond*, 588 U.S. 634 (2019) are on point and state that supervised release is constitutionally different than parole.

He believes that, based on those cases, the Court should reinstate his claims. “A court has the power to revisit prior decisions of its own... in any circumstance, although as a rule courts should

be loathe to do so in the absence of extraordinary circumstances....” *Christianson v. Colt Indus. Operating Corp.*, 486 U.S. 800, 817 (1988).

The decision of whether to reconsider a previous ruling in the same case is governed by the law of the case doctrine. *Santamarina v. Sears, Roebuck & Co.*, 466 F.3d 570, 571–72 (7th Cir. 2006). The law of the case is a discretionary doctrine that creates a presumption against reopening matters already decided in the same litigation and authorizes reconsideration only for a compelling reason such as where the court has misunderstood a party, where the court has made a decision outside the adversarial issues presented to the court by the parties, where the court has made an error of apprehension (not of reasoning), where a significant change in the law has occurred, or where significant new facts have been discovered.

See *Bank of Waunakee v. Rochester Cheese Sales, Inc.*, 906 F.2d 1185, 1191 (7th Cir. 1990). Here, there is not a compelling reason for the Court to reconsider its decision. To begin, the Court disagrees with Petitioner’s reading of *Thompson* and *Haymond*. *Thompson* focused on the imposition of conditions of supervised release as part of a sentence. 777 F.3d at 372–75.

It gave sentencing judges guidance on the explanation that is required to impose the conditions and the specificity that is required for the conditions to be constitutionally permissible. *Id.* at 375–82. The beginning of the decision notes a few differences between supervised release and parole. *Id.* at 372.

However, it does not state that the two are constitutionally different. *Id.* *Haymond* involved a Sixth Amendment challenge to § 3583(k), a supervised release provision applicable only to certain defendants. 588 U.S. at 640. While the plurality in *Haymond* implied that supervised release is constitutionally different than parole, see *id.* at 651–52, it is not the controlling opinion, see *United States v. Carpenter*, 104 F.4th 655, 660 (7th Cir.

2024) (holding that the controlling opinion in *Haymond* is Justice Breyer’s concurrence). And five Justices reached the opposite conclusion. See *Haymond*, 588 U.S. at 668 (Alito, J., dissenting) (finding that “[s]upervised release... is not fundamentally different” than parole); *id.* at 657–58 (Breyer, J., concurring) (stating that he “agree[s] with much of the dissent, in particular that the role of the judge in a supervised-release proceeding is consistent with traditional parole”).

Further, the Court’s dismissal of Grounds 2 and 4 is supported by applicable law. In Ground 2, Petitioner argued that the revocation of his supervised release violated the Double Jeopardy Clause of the Fifth Amendment. This argument is precluded by Seventh Circuit precedent. Revocation of supervised release is neither a punishment for the conduct that triggered the revocation nor an additional punishment for the original offense.

See *United States v. McIntosh*, 630 F.3d 699, 703 (7th Cir. 2011); *United States v. Wyatt*, 102 F.3d 241, 245 (7th Cir. 1996). Rather, it is a punishment for a breach of trust. See *United States v.*

Huusko, 275 F.3d 600, 603 (7th Cir. 2001). “[W]hen a defendant violates the terms of supervised release, it is the defendant’s breach of trust in failing to abide by those terms that is sanctioned.” United States v. Villasenor, 256 F. App’x 842, 844 (7th Cir.

2007). This breach of trust triggers a condition that permits the sentencing court to modify the sentence that it already imposed. See Wyatt, 102 F.3d at 245. In Ground 4, Petitioner argued that the Court had no power to condition his release from prison because he served his full term of imprisonment and was not given any leniency. This argument is precluded by 18 U.S.C. § 3583(a).

It states that, “[t]he court, in imposing a sentence to a term of imprisonment for a felony or a misdemeanor, may include as a part of the sentence a requirement that the defendant be placed on a term of supervised release after imprisonment.” Accordingly, if a sentencing court decides to impose supervised release, the term of imprisonment and the term of supervised release are part of one single sentence.

In such a case, a defendant has not served his entire sentence until after he has completed his term of supervised release. And until a defendant has served his full sentence, he is entitled to only conditional liberty. See United States v. Boultinghouse, 784 F.3d 1163, 1171 (7th Cir. 2015).

For the foregoing reasons, the Court DENIES Petitioner David Fields’s Motion for Reconsideration (Doc. 7). 3 IT IS SO ORDERED. DATED: March 24, 2026 of GALA Mod J. PHIL GILBERT United States District Judge