

SUPREME COURT OF PENNSYLVANIA

Williams v. Wetzel

Williams · No. 95 MAP 2019 · Decided June 16, 2020

SUMMARY

The Supreme Court of Pennsylvania held that the Commonwealth Court lacked original jurisdiction over a prisoner's due-process challenge because he failed to identify a constitutionally protected liberty or property interest. The court explained that inmates have no constitutionally protected interest in maintaining prison employment and reversed the Commonwealth Court's order granting declaratory and injunctive relief. The matter was remanded for dismissal of the petition for review.

CASE DETAILS

COURT	Supreme Court of Pennsylvania
WRITING FOR THE COURT	Chief Justice Saylor; Justice Baer; Justice Todd; Justice Donohue; Justice Dougherty; Justice Wecht; Justice Mundy
JURISDICTION	Pennsylvania
DECIDED	June 16, 2020
DOCKET	95 MAP 2019
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Direct appeal from an order of the Commonwealth Court exercising original jurisdiction over a prisoner's petition for review in the nature of mandamus.
STANDARD OF REVIEW	The Supreme Court addressed the Commonwealth Court's jurisdiction sua sponte; jurisdictional questions may be raised by an appellate court at any time.
PRECEDENTIAL VALUE	precedential
PARTIES	John E. Wetzel, Secretary of Corrections, Dorina Varner, Chief Grievance Officer, Barry Smith, Facility Manager, S.C.I. Houtzdale, Susan McQuillen, Inmate Employment Officer, Houtzdale, Ginter, Unit Manager, S.C.I. Houtzdale, Pittsinger, Food Service Manager, Houtzdale, Derring, Food Service Staff Member, Houtzdale, Pennsylvania Department of Corrections officials v. James H. Williams

TOPICS

subject matter jurisdiction

due process

prisoners rights

appellate procedure

administrative law

PRACTICE AREAS

civil procedure

appellate procedure

constitutional law

civil rights

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QUESTIONS PRESENTED

1. Whether the Commonwealth Court had original jurisdiction over Williams's due-process challenge when he did not identify a constitutionally protected liberty or property interest.
2. Whether an inmate has a constitutionally protected liberty or property interest in maintaining a prison employment assignment.

HOLDINGS

1. The Commonwealth Court lacks original jurisdiction to entertain a prisoner's due-process challenge to prison officials' actions when the prisoner fails to assert a constitutionally protected liberty or property interest.
2. An inmate has no constitutionally protected liberty or property interest in maintaining a prison employment assignment.

KEY QUOTATIONS

“the Commonwealth Court lacks original jurisdiction to entertain a prisoner’s due process challenge to the actions of prison officials, where the inmate fails to assert a constitutionally-protected liberty or property interest.” (at 2)

“discipline by prison officials in response to a wide range of misconduct falls within the expected perimeters of the sentence imposed by a court of law” (at 2)

“a jurisdictional impediment to judicial review may be raised by the appellate courts of their own accord.” (at 3)

FACTUAL BACKGROUND

Williams, a Pennsylvania state inmate, was searched while leaving his prison kitchen employment post, and officers discovered approximately two and one-half pounds of sugar concealed in his boots. After a support team hearing at his cell door, he was removed from his kitchen job. He alleged that prison officials failed to follow misconduct procedures under prison regulations and that the failure violated due process.

PROCEDURAL HISTORY

Williams filed a petition for review in the Commonwealth Court's original jurisdiction, alleging that prison officials removed him from a kitchen employment position without following prison misconduct procedures and thereby denied him due process. The Commonwealth Court granted declaratory and injunctive relief and

directed the Department of Corrections to comply with the regulations. The Pennsylvania Supreme Court reversed and remanded for dismissal of the petition.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Commonwealth Court for dismissal of the petition for review.

CASES CITED

- Williams v. Wetzel, 222 A.3d 49, 50-54 (Pa. Cmwlth. 2019)
- Dantzler v. Wetzel, 218 A.3d 519 (Pa. Cmwlth. 2019)
- Bronson v. Central Office Review Committee, 554 Pa. 317, 721 A.2d 357 (1998)
- Sandin v. Conner, 515 U.S. 472, 484-85, 115 S. Ct. 2293, 2300-01 (1995)
- Bush v. Veach, 1 A.3d 981, 984 (Pa. Cmwlth. 2010)
- DEP v. Cromwell Twp., Huntingdon Cty, 613 Pa. 1, 12, 32 A.3d 639, 646 (2011)
- Fenati v. DOC, No. 56 M.D. 2017, 2017 WL 5580069, at *3 (Pa. Cmwlth. Nov. 21, 2017)
- Watson v. DOC, 567 F. App'x 75, 78 (3d Cir. 2014) (per curiam)
- Johnson v. Rowley, 569 F.3d 40, 44 (2d Cir. 2009)
- Dellis v. Corr. Corp. of Am., 257 F.3d 508, 511 (6th Cir. 2001)
- Williams v. Meese, 926 F.2d 994, 998 (10th Cir. 1991)
- Adams v. James, 784 F.2d 1077, 1079 (11th Cir. 1986)