

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA

Marcus Richardson v. Emerson

Richardson v. Emerson · No. 1:25-cv-00353-SEB-CSW · Decided January 29, 2026

SUMMARY

The United States District Court for the Southern District of Indiana denied Marcus Richardson’s petition for a writ of habeas corpus challenging a prison disciplinary conviction and loss of good-time credit. The court held that the conduct report and video summary provided some evidence supporting the finding that Richardson battered another incarcerated person, and that self-defense is not a constitutionally required defense in prison disciplinary proceedings. The action was dismissed with prejudice and final judgment was directed.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana
WRITING FOR THE COURT	Sarah Evans Barker
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	January 29, 2026
DOCKET	1:25-cv-00353-SEB-CSW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus challenging an Indiana prison disciplinary conviction and resulting loss of good-time credit.
STANDARD OF REVIEW	The disciplinary decision is upheld if it rests on some evidence logically supporting it and demonstrating that the result is not arbitrary. Once some evidence supports the conviction, the court does not reweigh the evidence or consider whether other evidence supports a contrary result.
PRECEDENTIAL VALUE	Unknown
PARTIES	Marcus Richardson v. Emerson

TOPICS

- federal habeas corpus
- due process
- procedural due process
- prisoners rights
- post-conviction relief

PRACTICE AREAS

federal habeas corpus

prison disciplinary proceedings

constitutional due process

QUESTIONS PRESENTED

1. Whether the prison disciplinary conviction was supported by some evidence consistent with due process.
2. Whether Richardson could rely on self-defense to invalidate the prison disciplinary conviction.
3. Whether the disciplinary hearing officer improperly relied on false or conflicting evidence.

HOLDINGS

1. The disciplinary conviction satisfied due process because the conduct report and video summary constituted ample evidence that Richardson battered another inmate.
2. An inmate does not have a constitutional right to raise self-defense as a defense in a prison disciplinary proceeding.
3. The court may not reweigh the evidence underlying a disciplinary decision or determine whether other record evidence supports a contrary finding once some evidence supports the conviction.

KEY QUOTATIONS

“Inmates do not have a constitutional right to raise self-defense as a defense in the context of prison disciplinary proceedings.”

“The touchstone of due process is protection of the individual against arbitrary action of government.”

FACTUAL BACKGROUND

On June 14, 2024, Officer J. Saintil witnessed Richardson and another incarcerated person exchanging punches in a prison dayroom. Video showed that the other offender attacked Richardson first, but that Richardson continued striking him after the other offender no longer posed a threat and before staff deployed pepper spray. The disciplinary hearing officer found Richardson guilty of the lesser offense of B-212 and revoked 30 days of good-time credit, while acknowledging that Richardson had been targeted and attacked first.

PROCEDURAL HISTORY

Officer J. Saintil charged Richardson with battery against another offender. After notice, screening, a disciplinary hearing, review of video evidence, and administrative appeals, the disciplinary hearing officer found Richardson guilty of the lesser offense of B-212 and revoked 30 days of good-time credit. Richardson then filed this federal habeas petition, which the court denied and dismissed with prejudice.

DISPOSITION

dismissed

CASES CITED

- *Ellison v. Zatecky*, 820 F.3d 271, 274 (7th Cir. 2016)
- *Scruggs v. Jordan*, 485 F.3d 934, 939 (7th Cir. 2007)
- *Rhoiney v. Neal*, 723 F. App'x 347, 348 (7th Cir. 2018)
- *Superintendent, Mass. Corr. Inst. v. Hill*, 472 U.S. 445, 454-56 (1985)
- *Wolff v. McDonnell*, 418 U.S. 539, 558, 563-67 (1974)
- *Moffat v. Broyles*, 288 F.3d 978, 981 (7th Cir. 2002)
- *Eichwedel v. Chandler*, 696 F.3d 660, 675 (7th Cir. 2012)
- *Jones v. Cross*, 637 F.3d 841, 848-49 (7th Cir. 2011)
- *Webb v. Anderson*, 224 F.3d 649, 652 (7th Cir. 2000)