

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, PEORIA DIVISION

Jeremy Martin Haar v. Eric Walters, Warden, FCI Pekin

Haar · No. 1:24-cv-1129 · Decided November 25, 2025

SUMMARY

The United States District Court for the Central District of Illinois denied Jeremy Martin Haar’s petition for habeas corpus under 28 U.S.C. § 2241. Haar challenged the revocation of 27 days of good-conduct time following a disciplinary finding that he used a prohibited three-way telephone call, arguing lack of impartiality, inadequate notice, and vagueness. The court held that the disciplinary proceedings satisfied due process, that Haar received fair notice of the telephone rules, and that Prohibited Act 297 was not unconstitutionally vague.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Colleen R. Lawless
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	November 25, 2025
DOCKET	1:24-cv-1129
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the loss of federal good-conduct time following a prison disciplinary proceeding.
STANDARD OF REVIEW	The court reviewed whether the disciplinary proceeding satisfied the minimum due-process requirements for revocation of good-conduct time and whether Prohibited Act 297 was unconstitutionally vague. Prison disciplinary findings must be supported by some evidence in the record.
PRECEDENTIAL VALUE	Unknown; federal district court opinion with no reporter citation identified
PARTIES	Jeremy Martin Haar v. Eric Walters, Warden, FCI Pekin

TOPICS

federal habeas corpus

prisoners rights

procedural due process

void for vagueness

post-conviction relief

PRACTICE AREAS

Federal habeas corpus

Prison disciplinary proceedings

Constitutional due process

QUESTIONS PRESENTED

1. Whether the Discipline Hearing Officer was impermissibly biased or predetermined Haar's guilt.
2. Whether due process required FCI Lewisburg to provide Haar with a new rule book or orientation materials despite his prior receipt of Bureau of Prisons telephone rules at FCI Schuylkill.
3. Whether Bureau of Prisons Prohibited Act 297 is facially void for vagueness.
4. Whether Haar was entitled to habeas relief under 28 U.S.C. § 2241 based on the disciplinary proceeding and revocation of good-conduct time.

HOLDINGS

1. Haar did not present clear evidence sufficient to overcome the presumption that the Discipline Hearing Officer was honest and impartial; the alleged comments, even if made, did not establish that the hearing outcome was predetermined.
2. Due process did not require FCI Lewisburg to provide Haar with a new rule book because he had previously received Bureau of Prisons materials and an inmate handbook giving notice that third-party and three-way telephone calls were prohibited.
3. Prohibited Act 297 is not unconstitutionally vague, and its application to prohibit three-way telephone calls is not vague.
4. The disciplinary proceedings satisfied the minimum due-process requirements applicable to revocation of good-conduct time.

KEY QUOTATIONS

“Due process requires that prison administrators cannot revoke good time credits without “(1) advance written notice of the disciplinary charges; (2) an opportunity, when consistent with institutional safety and correctional goals, to call witnesses and present documentary evidence in his defense; and (3) a written statement by the factfinder of the evidence relied on and the reasons for the disciplinary action.”” (II)

“The rule allows the BOP to address creative attempts to “circumvent the ability of staff to monitor frequency of telephone use, content of the call, or the number called.”” (II.C)

FACTUAL BACKGROUND

Haar was serving a 180-month federal sentence and, while housed at FCI Lewisburg, made a telephone call in which another person called a second number, creating a three-way call. The Bureau of Prisons charged him under Prohibited Act 297, which prohibits telephone use that circumvents staff monitoring, and the DHO found

him guilty and revoked 27 days of good-conduct time. Haar maintained that the DHO was biased, that he lacked fair notice of the prohibition, and that the regulation was vague, although he did not dispute that the three-way call occurred.

PROCEDURAL HISTORY

Haar received a disciplinary charge for using a three-way telephone call in violation of Bureau of Prisons Prohibited Act 297. After a Discipline Hearing Officer found him guilty and revoked 27 days of good-conduct time, Haar exhausted available administrative remedies and filed this § 2241 petition. He initially raised four grounds, but conceded in reply that he had received timely notice of the charge; the court rejected his remaining impartiality, fair-notice, and vagueness claims and denied the petition.

DISPOSITION

other

CASES CITED

- In re Hall, 988 F.3d 376, 378 (7th Cir. 2021)
- Waletzki v. Keohane, 13 F.3d 1079, 1081 (7th Cir. 1994)
- Wolff v. McDonnell, 418 U.S. 539, 558, 563-67, 570-71 (1974)
- Superintendent, Massachusetts Correctional Institution, Walpole v. Hill, 472 U.S. 445, 448, 454-55 (1985)
- Jones v. Cross, 637 F.3d 841, 845 (7th Cir. 2011)
- Piggie v. Cotton, 342 F.3d 660, 666 (7th Cir. 2003)
- Withrow v. Larkin, 421 U.S. 35, 47 (1975)
- Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813, 821 (1986)
- Nelson v. Stevens, 861 F. App'x 667, 670 (7th Cir. 2021)
- Prude v. Meli, 76 F.4th 648, 657-58 (7th Cir. 2023)
- Whitford v. Boglino, 63 F.3d 527, 534 (7th Cir. 1995)
- Gaines v. Pretorius, No. 2:24-CV-00557-JMS-MG, 2025 WL 1312252, at *9 (S.D. Ind. May 6, 2025)
- Chambers v. Ciolli, No. 20 CV 50135, 2021 WL 4192079, at *3 (N.D. Ill. Sept. 15, 2021)
- Koutnik v. Brown, 456 F.3d 777, 783-84 (7th Cir. 2006)
- Fuller by Fuller v. Decatur Public School Board of Education School District 61, 251 F.3d 662, 666 (7th Cir. 2001)
- Isby-Israel v. Finnan, 347 F. App'x 253, 255 (7th Cir. 2009)
- Village of Hoffman Estates v. Flipside, Hoffman Estates, Inc., 455 U.S. 489, 495 (1982)