

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals

For the Seventh Circuit

Chicago, Illinois 60604

Submitted December 3, 2025*

Decided December 4, 2025

Before

DAVID F. HAMILTON, *Circuit Judge*

CANDACE JACKSON-AKIWUMI, *Circuit Judge*

JOHN Z. LEE, *Circuit Judge*

No. 25-1851

GREGORY D. JONES,
Plaintiff-Appellant,

v.

JEFFREY D. SPENCER,
Defendant-Appellee.

Appeal from the United States District
Court for the Southern District of
Illinois.

No. 24-cv-01364-SMY

Staci M. Yandle,
Judge.

ORDER

Gregory Jones, an Illinois prisoner, appeals the judgment dismissing his complaint brought under 42 U.S.C. § 1983 challenging the constitutionality of a disciplinary action taken against him. The district court dismissed the complaint for

* The appellee was not served with process and is not participating in this appeal. We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

failure to state a claim because Jones did not have a protected liberty interest implicated by the discipline he received, an oral warning. We affirm.

We construe Jones's pro se complaint liberally and assume the truth of his allegations, as supplemented by the prison records he attached. *See Otis v. Demarasse*, 886 F.3d 639, 644 (7th Cir. 2018). In April 2023, Jones received a citation for violating a rule that required prisoners to be ready each morning for inspection of their property boxes. According to the disciplinary report, Jones broke the rule by sleeping through an inspection. Two weeks later, the prison's adjustment committee held a hearing on Jones's citation. The final summary report, signed by the committee's chairperson, Jeffrey Spencer, states that Jones attended the hearing, pleaded not guilty, requested no witnesses, and ultimately admitted to the rule violation. Jones was punished with an oral reprimand.

Jones later brought this § 1983 suit against Spencer for violating his rights under the Due Process Clause of the Fourteenth Amendment in connection with the disciplinary proceedings. Jones alleged that Spencer made false statements in the final summary report, that no disciplinary hearing was held, that he had no opportunity to call witnesses, and that he did not plead guilty.

The district judge screened Jones's complaint under 28 U.S.C. § 1915A and dismissed it because the oral warning did not implicate a liberty interest that triggered the protections of the Due Process Clause. *See Sandin v. Conner*, 515 U.S. 472, 484 (1995). The judge dismissed Jones's remaining claims for failure to state a claim.

On appeal, Jones makes a narrow factual challenge, arguing that the district court overlooked inconsistencies and falsifications in the final summary report. Jones points to statements in the report, for instance, that he both pleaded not guilty and made an admission of guilt. But these statements do not bear on this appeal. As the court rightly concluded, Jones's alleged punishment—an oral reprimand—is not an “atypical and significant hardship ... in relation to the ordinary incidents of prison life,” *Sandin*, 515 U.S. at 484, and does not implicate any protected liberty interest, *see Moore v. Pemberton*, 110 F.3d 22, 23 (7th Cir. 1997).

Jones also levels a charge of bias against the district judge, who, he says, dismissed his case after he filed a complaint that accused her of misconduct. But adverse rulings do not provide a valid basis to question a judge's impartiality. *Liteky v.*

United States, 510 U.S. 540, 555 (1994). The district court's decision was clearly correct, beyond a reasonable debate.

AFFIRMED