

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

BRYAN PHILLIP BONHAM,
Appellant,
vs.
JEREMY BEAN, WARDEN, AND THE
STATE OF NEVADA,
Respondents.

No. 91267-COA

FILED

FEB 27 2026

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY *[Signature]*
DEPUTY CLERK

ORDER OF AFFIRMANCE

Bryan Phillip Bonham appeals from a district court order dismissing a “petition for a writ of habeas corpus (disciplinary)” filed on October 30, 2024.¹ Seventh Judicial District Court, White Pine County; Dylan V. Frehner, Judge.

Following a Nevada Department of Corrections disciplinary hearing, Bonham was found not guilty of larceny by trick. Thereafter, Bonham filed a postconviction petition for a writ of habeas corpus arguing his due process rights were violated during disciplinary proceedings where he received neither a timely notice of charges nor a timely disciplinary hearing. He contended the prolonged disciplinary process caused him to lose out on earning work credits. The district court dismissed Bonham’s petition because his claims were not cognizable in a postconviction habeas petition as Bonham did not demonstrate he lost statutory credits.

¹Bonham originally filed his petition in the Eighth Judicial District Court on October 30, 2024. It was transferred and filed in the Eleventh Judicial District Court on June 20, 2025.

Because Bonham did not lose any credits as a result of prison disciplinary proceedings, we conclude the district court correctly determined that Bonham's claims were not cognizable in a petition for a writ of habeas corpus filed in state court. See NRS 34.724(1) (limiting postconviction habeas petitions to claims challenging the conviction, sentence, or computation of time served); *Bowen v. Warden*, 100 Nev. 489, 490, 686 P.2d 250, 250 (1984) (holding "a petition for writ of habeas corpus may challenge the validity of current confinement, but not the conditions thereof"); see also *Vickers v. Dzurenda*, 134 Nev. 747, 748, 433 P.3d 306, 308 (Ct. App. 2018) (holding that a prisoner who does not work while in prison is not entitled to work credits). Therefore, we conclude the district court did not err by dismissing Bonham's petition.

To the extent Bonham makes an independent challenge as to the computation of time served because he was unable to earn work credit, that claim is further barred because he did not allege sufficient facts that he had exhausted his administrative remedies. See *Hall v. Oliver*, 141 Nev., Adv. Op. 70, ___ P.3d ___, ___ (Ct. App. 2025); see also NRS 34.724(1). Therefore, we conclude Bonham was not entitled to relief, and we

ORDER the judgment of the district court AFFIRMED.


_____, C.J.
Bulla


_____, J.
Gibbons


_____, J.
Westbrook

cc: Dylan V. Frehner, District Judge
Bryan Phillip Bonham
Attorney General/Carson City
White Pine County District Attorney
White Pine County Clerk