

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Raymond Justis v. C. Carter, Warden

Justis · No. 23-2115-TDC · Decided January 7, 2026

SUMMARY

The United States District Court for the District of Maryland denied Raymond Justis’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ refusal to award him First Step Act time credits. The court held that Justis’s conviction under 18 U.S.C. § 1591 independently rendered him ineligible for those credits, notwithstanding his accompanying conviction under 18 U.S.C. § 1594. The court also rejected his challenge to the Bureau’s offense-code designation and ordered the case closed.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Theodore D. Chuang
JURISDICTION	United States District Court for the District of Maryland
DECIDED	January 7, 2026
DOCKET	23-2115-TDC
DISPOSITION	denied
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the denial of First Step Act Time Credits.
STANDARD OF REVIEW	The court reviewed the § 2241 petition on the submitted materials without a hearing and interpreted the First Step Act according to its plain language.
PRECEDENTIAL VALUE	Unpublished memorandum order; precedential status unknown
PARTIES	Raymond Justis v. C. Carter, Warden

TOPICS

- federal habeas corpus
- post-conviction relief
- statutory interpretation
- sentencing

PRACTICE AREAS

- Federal habeas corpus
- Federal sentencing
- Statutory interpretation
- Prisoner litigation

QUESTIONS PRESENTED

1. Whether a prisoner convicted under both 18 U.S.C. § 1591 and § 1594 is eligible to earn First Step Act Time Credits because § 1594 is excepted from the statutory exclusions.
2. Whether the Bureau of Prisons improperly denied eligibility based on an offense code stating that the prisoner financially benefited from participation in a venture.
3. Whether the challenge to the computation and execution of the sentence was properly brought under 28 U.S.C. § 2241 in the district of confinement.

HOLDINGS

1. A prisoner serving a sentence for a conviction under 18 U.S.C. § 1591 is statutorily ineligible to earn First Step Act Time Credits even when the same sentence also includes a conviction under § 1594, which is excepted from the statutory exclusion.
2. Justis was not entitled to habeas relief based on the challenged offense-code designation because his § 1591 conviction independently barred him from earning FSA Time Credits, regardless of any alleged error in the designation.
3. A claim seeking credit against a sentence that challenges computation or execution of the sentence rather than the sentence itself may be brought under § 2241 in the district of confinement.

KEY QUOTATIONS

“The plain language of the statute explicitly states that a “prisoner is ineligible” to receive FSA Time Credits “if the prisoner is serving a sentence for a conviction under any of the following provisions of law,” including 18 U.S.C. § 1591.” (Discussion)

“Because Justis is statutorily prohibited from earning FSA Time Credits because he is serving a sentence for a conviction under 18 U.S.C. § 1591, the Petition will be denied.” (Conclusion)

FACTUAL BACKGROUND

Justis was sentenced in the Eastern District of Pennsylvania to 168 months' imprisonment and five years of supervised release for sex trafficking of a minor under 18 U.S.C. §§ 1591(b)(2) and 1594. He sought First Step Act Time Credits, but the Bureau of Prisons determined that his conviction under § 1591 was a disqualifying offense. Justis argued that his concurrent conviction under § 1594 made him eligible and separately challenged the Bureau's use of an offense code concerning participation in a venture.

PROCEDURAL HISTORY

Justis, a federal prisoner confined in Maryland, filed a § 2241 petition challenging the Bureau of Prisons' determination that he was ineligible to earn and apply First Step Act Time Credits. The petition was fully briefed, and the court determined that no hearing was necessary. The District of Maryland denied the petition and ordered the case closed.

DISPOSITION

denied

CASES CITED

- United States v. Miller, 871 F.2d 488, 490 (4th Cir. 1989)
- Bonnie v. Dunbar, 157 F.4th 610, 616, 618 (4th Cir. 2025)

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