

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Dylan Anthony Davis v. Warden FCI Cumberland

Davis · No. ABA-25-1559 · Decided February 11, 2026

SUMMARY

The United States District Court for the District of Maryland denied Dylan Anthony Davis’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ determination of his pre-release community placement. The court held that Davis failed to exhaust available administrative remedies and that his challenge to the BOP’s individualized placement decision was not subject to judicial review under 18 U.S.C. § 3625. The court also concluded that the applicable statutes do not guarantee a prisoner a predetermined period in community placement or a residential reentry center.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Adam B. Abelson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	February 11, 2026
DOCKET	ABA-25-1559
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241; respondent moved to dismiss or, alternatively, for summary judgment.
STANDARD OF REVIEW	For the Rule 12(b)(6) motion, the court accepted factual allegations as true and drew reasonable inferences in the petitioner's favor, asking whether the petition stated a plausible claim for relief. The court also addressed jurisdiction and exhaustion before reaching the merits in the alternative.
PRECEDENTIAL VALUE	unpublished
PARTIES	Dylan Anthony Davis v. Warden FCI Cumberland

TOPICS

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PRACTICE AREAS

federal habeas corpus

administrative law

prisoner rights

statutory interpretation

QUESTIONS PRESENTED

1. Whether Davis was excused from exhausting Bureau of Prisons administrative remedies before seeking § 2241 habeas relief.
2. Whether the district court had jurisdiction to review the Bureau of Prisons' individualized pre-release placement decision under § 2241 or the Administrative Procedure Act.
3. Whether the Second Chance Act guarantees a federal prisoner a particular period of community confinement or RRC placement.
4. Whether *Loper Bright Enterprises v. Raimondo* required judicial review of the Bureau of Prisons' discretionary placement determination.

HOLDINGS

1. A federal prisoner generally must exhaust available Bureau of Prisons administrative remedies before seeking habeas review under § 2241, and Davis's asserted delay and alleged futility did not excuse his failure to complete that process.
2. The court lacked jurisdiction to review the BOP's adjudicative decision determining Davis's pre-release placement because 18 U.S.C. § 3625 precludes judicial review of determinations, decisions, or orders made under 18 U.S.C. §§ 3621–3626.
3. The Second Chance Act does not guarantee a federal prisoner a predetermined length of community placement or RRC placement; the BOP has discretion to determine how best to provide a reasonable opportunity for reentry.
4. *Loper Bright* does not provide a basis for judicial review of the BOP's discretionary placement decision because the issue is governed by § 3625's jurisdictional bar, not merely by deference to an agency's statutory interpretation.

KEY QUOTATIONS

“The statute grants the BOP Director discretion to determine how best to provide BOP prisoners with a reasonable opportunity to adjust to and prepare for reentry into the community; it does not guarantee BOP prisoners any pre-determined length of stay in community placement or an RRC.” (III)

“Absent a valid excuse, Davis’s failure to exhaust administrative remedies divests this Court of jurisdiction and the merits of his claim may not be considered until and unless he exhausts administrative remedies.” (III)

FACTUAL BACKGROUND

Davis was serving a 144-month federal sentence at FPC Cumberland and sought 365 days of Second Chance Act pre-release community placement. His institutional Unit Team recommended the full 365 days, and the recommendation was approved by the Camp Administrator and Warden. Davis alleged that a regional reentry

official later reduced the placement to 82 days without an individualized explanation or reconsideration of the statutory factors, while the government disputed that a blanket 60-day policy had existed.

PROCEDURAL HISTORY

Davis filed a § 2241 petition challenging the Bureau of Prisons' reduction of his recommended Second Chance Act community-placement period and seeking a full 365-day placement or a new individualized assessment. He had filed an institutional grievance but did not appeal the Warden's response through the remaining administrative levels. The district court granted the respondent's motion, denied the petition, and concluded alternatively that the challenged placement decision was not subject to judicial review and that Davis was not entitled to a particular period of community confinement.

DISPOSITION

dismissed

CASES CITED

- *Washington v. Hous. Auth. of the City of Columbia*, 58 F.4th 170, 177 (4th Cir. 2023)
- *Singer v. Real*, 883 F.3d 425, 437 (4th Cir. 2018)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)
- *Swaso v. Onslow Cnty. Bd. of Educ.*, 698 F. App'x 745, 747 (4th Cir. 2017)
- *Owens v. Balt. City State's Att'ys Off.*, 767 F.3d 379, 396 (4th Cir. 2014)
- *Timms v. Johns*, 627 F.3d 525, 530–33 (4th Cir. 2010)
- *Munaf v. Geren*, 553 U.S. 674, 693 (2008)
- *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 489–91 (1973)
- *McClung v. Shearin*, 90 F. App'x 444, 445 (4th Cir. 2004)
- *Miller v. Clark*, 958 F.2d 368, 1992 WL 48031, at *1 (4th Cir. 1992)
- *Henderson v. Warden, Edgefield Satellite Prison Camp*, No. 2:09-cv-01599-RBH, 2009 WL 3317149, at *2 (D.S.C. Oct. 14, 2009)
- *McCarthy v. Madigan*, 503 U.S. 140, 145–46 (1992)
- *McKart v. United States*, 395 U.S. 185, 193–94 (1969)
- *Fraley v. U.S. Bureau of Prisons*, 1 F.3d 924, 925 (9th Cir. 1993)
- *Ross v. Blake*, 578 U.S. 632, 643–44 (2016)
- *Clinkenbeard v. King*, No. CV 23-3151 (JRT/LIB), 2024 WL 4355063, at *4 (D. Minn. Sept. 30, 2024)
- *United States v. Moore*, 978 F.2d 1029, 1031 (8th Cir. 1992)
- *Mero v. Yates*, No. 2:22-72, 2022 WL 17653228, at *5 (E.D. Ark. Sept. 27, 2022)
- *Minotti v. Whitehead*, 54 F. Supp. 2d 750, 761 (D. Md. 2008)
- *Belcher v. Stewart*, Civ. No. CCB-18-3471, 2020 WL 512731, at *3 (D. Md. Jan. 30, 2020)
- *Hubbard v. Carter*, Civ. No. BAH-24-729, 2025 WL 524117, at *4 (D. Md. Feb. 18, 2025)

- *Richmond v. Scibana*, 387 F.3d 602, 605 (7th Cir. 2004)
- *Martin v. Gerlinski*, 133 F.3d 1076, 1079 (8th Cir. 1998)
- *Jasperson v. Fed. Bureau of Prisons*, 460 F. Supp. 2d 76, 84 (D.D.C. 2006)
- *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 391–94 (2024)

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