

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
ILLINOIS

Pamela Renee Puckett v. Acting Warden

No. 25-CV-1609-DWD (S.D. Ill. Jan. 22, 2026) · No. 25-CV-1609-DWD · Decided January 22, 2026

SUMMARY

The United States District Court for the Southern District of Illinois dismissed Pamela Renee Puckett’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ calculation and application of First Step Act time credits. The court held that Puckett failed to exhaust available administrative remedies and that no exception justified excusing exhaustion. In the alternative, the court concluded that projected or additional credits could affect only the place of confinement, rather than the duration of custody, and therefore were not cognizable in a habeas petition.

CASE DETAILS

|                       |                                                                                                                                                            |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of Illinois                                                                                         |
| WRITING FOR THE COURT | David W. Dugan                                                                                                                                             |
| JURISDICTION          | United States District Court for the Southern District of Illinois                                                                                         |
| DECIDED               | January 22, 2026                                                                                                                                           |
| DOCKET                | 25-CV-1609-DWD                                                                                                                                             |
| DISPOSITION           | dismissed                                                                                                                                                  |
| PROCEDURAL POSTURE    | Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the Bureau of Prisons’ calculation and application of First Step Act time credits. |
| STANDARD OF REVIEW    | The court reviewed the § 2241 petition and the exhaustion issue as a matter of law; the opinion does not identify a separately stated standard of review.  |
| PRECEDENTIAL VALUE    | Unpublished district court memorandum; persuasive value only                                                                                               |
| PARTIES               | Pamela Renee Puckett v. Acting Warden                                                                                                                      |

TOPICS

- federal habeas corpus
- exhaustion of remedies
- sentence modification
- post-conviction relief
- administrative procedure act

## PRACTICE AREAS

Federal habeas corpus

Federal sentencing

Prisoner litigation

Administrative exhaustion

## QUESTIONS PRESENTED

1. Whether the court should excuse Puckett's failure to exhaust the Bureau of Prisons' administrative-remedy process before seeking relief under § 2241.
2. Whether projected, unearned First Step Act time credits may be applied to reduce a federal prisoner's sentence.
3. Whether a claim seeking acceleration of pre-release custody based on additional or projected First Step Act credits is cognizable in a § 2241 habeas petition.

## HOLDINGS

1. A federal prisoner challenging the Bureau of Prisons' sentence or credit calculation must complete the available administrative-remedy process before seeking judicial review under § 2241, absent a recognized exception. Puckett did not exhaust because she failed to cure the deficient regional appeal and did not pursue a Central Office appeal, and no exception justified excusing exhaustion.
2. Projected, unearned First Step Act time credits may not be applied in calculating a federal prisoner's release or placement date.
3. Once the statutory maximum of 365 First Step Act time-credit days has been applied toward early transfer to supervised release, additional credits cannot further shorten the prisoner's sentence and may affect only the timing of pre-release custody.
4. A claim seeking only to accelerate placement in pre-release custody challenges the location or conditions of confinement rather than the fact or duration of confinement and is therefore not cognizable in a § 2241 habeas petition.

## KEY QUOTATIONS

*"A court may excuse exhaustion only in limited circumstances: where delay would cause prejudice, the agency lacks authority to grant relief, exhaustion would be futile due to bias or predetermination, or substantial constitutional issues are presented."*

*"Accordingly, the Petition is DISMISSED without prejudice."*

## FACTUAL BACKGROUND

Puckett is serving a 210-month federal sentence for drug-distribution and money-laundering conspiracy offenses at the Federal Prison Camp at FCI Greenville. As of August 24, 2025, the Bureau of Prisons had credited her with 885 First Step Act time credits, applying 365 days toward early release and the remainder toward pre-release custody. She sought application of projected future credits that she claimed would advance her transition-to-community or release dates, but she did not complete the Bureau's administrative-remedy process before filing her petition.

## PROCEDURAL HISTORY

Puckett filed a § 2241 petition alleging that the Bureau of Prisons failed to apply her First Step Act time credits in their entirety and seeking credit for projected future credits. She had submitted a BP-9 request, but her regional appeal was rejected for failure to include the BP-9 and its response; she did not correct the deficiency or pursue a Central Office appeal. The district court dismissed the petition without prejudice for failure to exhaust administrative remedies and alternatively held that the requested relief was not cognizable under § 2241.

## DISPOSITION

dismissed

## CASES CITED

- United States v. Walker, 917 F.3d 989, 994 (7th Cir. 2019)
- Richmond v. Scibana, 387 F.3d 602, 604 (7th Cir. 2004)
- Woodford v. Ngo, 548 U.S. 81, 89 (2006)
- Gonzalez v. O’Connell, 355 F.3d 1010, 1016 (7th Cir. 2004)
- Greene v. Meese, 875 F.2d 639, 641 (7th Cir. 1989)
- Ramirez v. Zuercher, No. 08-1283, 2008 WL 4724289, at \*2 (C.D. Ill. Oct. 24, 2008)
- Ihmoud v. Jett, 272 F. App’x 525, 526–27 (7th Cir. 2008)
- Kane v. Zuercher, 344 F. App’x 267, 269 (7th Cir. 2009)
- Preiser v. Rodriguez, 411 U.S. 475, 489–90 (1973)
- United States v. Wilson, 503 U.S. 329, 335 (1992)
- Tapia v. United States, 564 U.S. 319, 331 (2011)
- United States v. Saunders, 986 F.3d 1076, 1078 (7th Cir. 2021)
- Cox v. Rardin, No. 2:24-CV-10676, 2025 WL 495342, at \*5 (E.D. Mich. Feb. 13, 2025)
- Jun v. FPC-Duluth, No. 22-CV-2704, 2023 WL 5917739, at \*8 (D. Minn. June 30, 2023), adopted, 2023 WL 5899128 (D. Minn. Sept. 11, 2023)
- United States v. Houck, 2 F.4th 1082, 1085 (8th Cir. 2021)
- Palmer v. Sproul, 2025 WL 346589, at \*1 (S.D. Ill. Jan. 30, 2025)
- Williams, 2025 WL 1880039, at \*2