

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS

Donell Fraser v. C. Humphrey, Warden

Fraser v. Humphrey, No. 2:25-cv-00226-JM-ERE · No. No. 2:25-cv-00226-JM-ERE · Decided February 12,
2026

SUMMARY

The United States District Court for the Eastern District of Arkansas recommends dismissing Donell Fraser’s 28 U.S.C. § 2241 petition without prejudice for lack of subject-matter jurisdiction. Fraser challenged the Bureau of Prisons’ treatment of his 18 U.S.C. § 922(g) conviction as a violent offense in calculating his PATTERN recidivism score and eligibility to apply earned time credits. The court concluded that the requested relief would not necessarily result in earlier release because Fraser would remain ineligible based on his recidivism assessment and other statutory requirements.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	February 12, 2026
DOCKET	No. 2:25-cv-00226-JM-ERE
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241; recommended dismissal without prejudice for lack of federal habeas jurisdiction.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Donell Fraser v. C. Humphrey, Warden

TOPICS

- [federal habeas corpus](#) [post-conviction relief](#) [remedies](#) [administrative law](#)

PRACTICE AREAS

- [Federal habeas corpus](#) [Post-conviction relief](#) [Federal sentencing and prison administration](#)

QUESTIONS PRESENTED

1. Whether federal habeas jurisdiction exists over a § 2241 petition challenging the Bureau of Prisons' classification of a § 922(g) conviction as a violent offense for purposes of the PATTERN risk assessment and earned-time-credit eligibility.
2. Whether the petition should be dismissed because the requested relief would not necessarily result in an earlier release.
3. Whether the petition could succeed on the merits based on the Bureau of Prisons' treatment of § 922(g) convictions in the PATTERN assessment.

HOLDINGS

1. Federal habeas jurisdiction is lacking because Fraser's requested removal of the § 922(g) violent-offense designation would not necessarily result in an earlier release.
2. The petition would also be subject to dismissal on the merits because the Bureau of Prisons has discretion under the First Step Act to treat unlawful possession of a firearm as violent for PATTERN risk-assessment purposes.

KEY QUOTATIONS

"The essence of habeas corpus is an attack by a person in custody upon the legality of that custody."
(Discussion § II.B)

"Because neither prisoner's claim would necessarily spell speedier release, neither lies at 'the core of habeas corpus.'" (Discussion § II.B)

FACTUAL BACKGROUND

Fraser was serving a 120-month federal sentence after pleading guilty to drug-distribution and felon-in-possession offenses. The Bureau of Prisons classified his § 922(g) conviction as a violent offense for PATTERN purposes, affecting his risk score and potential access to earned-time-credit benefits, prerelease custody, or early transfer to supervised release. Even if the § 922(g) points were removed, the court concluded that Fraser would remain in the medium-risk category and would not become eligible for application of earned time credits based on the requested recalculation.

PROCEDURAL HISTORY

Fraser, a federal inmate proceeding pro se, filed a § 2241 petition challenging the Bureau of Prisons' treatment of his 18 U.S.C. § 922(g) conviction as a violent offense in calculating his PATTERN recidivism score. The respondent opposed the petition on jurisdictional, exhaustion, and merits grounds, and Fraser filed a reply. The magistrate judge recommended dismissal without prejudice because the requested relief would not necessarily result in earlier release.

DISPOSITION

dismissed

CASES CITED

- Kruger v. Erickson, 77 F.3d 1071, 1073 (8th Cir. 1996)
- Preiser v. Rodriguez, 411 U.S. 475, 484 (1973)
- Spencer v. Haynes, 774 F.3d 467, 469 (8th Cir. 2014)
- Wilkinson v. Dotson, 544 U.S. 74, 82 (2005)
- Vang v. Eischen, No. 23-CV-721 (JRT/DLM), 2023 WL 5417764, at *2 (D. Minn. Aug. 1, 2023)
- Green v. Hudson, No. 23-3141, 2024 WL 960497, at *2 (10th Cir. Mar. 6, 2024)
- Conley v. Healy, No. 5:24-CV-1430, 2025 WL 1736695, at *2 (N.D. Ohio June 23, 2025)
- Stewart v. Warden, FCI Danbury, No. 24-CV-1553 (VDO), 2025 WL 3180503, at *2 (D. Conn. Nov. 14, 2025)
- Harris v. Holzapfel, No. 5:23-CV-00610, 2025 WL 769606, at *11 (S.D. W. Va. Feb. 14, 2025)

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