

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

Matthew John Olson v. J. Sage (Warden)

Olson · No. 1:24-cv-01160 · Decided February 24, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Matthew John Olson’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. Olson challenged the Bureau of Prisons’ calculation of credit for time served in North Dakota custody toward his federal sentence. The court held that he failed to fully exhaust the Bureau of Prisons’ administrative remedies and stated that, even if exhaustion had been satisfied, the credit claim would fail because the disputed state-custody time had been credited against another sentence.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                                                                        |
| WRITING FOR THE COURT | Yvette Kane                                                                                                                                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                                                                        |
| DECIDED               | February 24, 2026                                                                                                                                                                                                                                                                                                                           |
| DOCKET                | 1:24-cv-01160                                                                                                                                                                                                                                                                                                                               |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Federal prisoner Olson filed a petition under 28 U.S.C. § 2241 challenging the Bureau of Prisons' calculation of credit toward his federal sentence for time spent in state custody. The respondent opposed the petition, arguing failure to exhaust administrative remedies and, alternatively, that the sentence calculation was correct. |
| STANDARD OF REVIEW    | The Court reviewed the § 2241 petition to determine whether Olson demonstrated exhaustion of available administrative remedies and, alternatively, whether the Bureau of Prisons correctly calculated his sentence and prior-custody credit.                                                                                                |
| PRECEDENTIAL VALUE    | unpublished district court memorandum; nonprecedential                                                                                                                                                                                                                                                                                      |
| PARTIES               | Matthew John Olson v. J. Sage (Warden)                                                                                                                                                                                                                                                                                                      |

TOPICS

federal habeas corpus

exhaustion of remedies

post-conviction relief

sentencing

sentence modification

## PRACTICE AREAS

federal habeas corpus

post-conviction relief

criminal procedure

sentencing

## QUESTIONS PRESENTED

1. Whether Olson exhausted the Bureau of Prisons' multi-step administrative-remedy process before filing his § 2241 petition.
2. Whether the Bureau of Prisons properly calculated the commencement of Olson's federal sentence and his prior-custody credit under 18 U.S.C. § 3585.
3. Whether Olson could receive federal sentence credit for time in state custody that had already been credited against his state parole-violation sentence.

## HOLDINGS

1. Olson failed to establish that he completed the Bureau of Prisons' administrative-remedy process because the record showed appeals only through the regional level and did not show that he filed an appeal with the BOP Central Office.
2. Even if Olson had exhausted his administrative remedies, the BOP properly determined that his federal sentence could not commence before the date imposed and, in this case, commenced when he surrendered to the BOP on February 15, 2017.
3. Olson was not entitled to federal prior-custody credit for the period from September 11, 2014, through August 6, 2015, because that time had been credited against his state parole-violation sentence.

## KEY QUOTATIONS

*“Federal prisoners are ordinarily required to exhaust their administrative remedies before petitioning for a writ of habeas corpus pursuant to § 2241.”*

*“District courts have no authority to credit time toward a sentence under [18 U.S.C.] § 3585(b)—that function rests in the sole authority of the BOP.”*

*“Congress made it clear that a defendant could not receive a double credit for [their] detention time.”*

## FACTUAL BACKGROUND

North Dakota authorities arrested Olson on August 13, 2014, on state drug charges, and his North Dakota parole was revoked. He remained in state custody until he was paroled to federal custody on August 6, 2015; the state charges were later dismissed, while the period from September 11, 2014, through August 6, 2015, was credited toward his state parole-violation sentence. Olson was federally sentenced on January 23, 2017, and voluntarily surrendered to the Bureau of Prisons on February 15, 2017. He claimed that the BOP should also credit his federal sentence for the period spent in state custody after the parole violation.

## PROCEDURAL HISTORY

Olson filed the § 2241 petition on July 15, 2024. The Court ordered a response, Respondent filed an opposition, and Olson filed a reply. The Court dismissed the petition for failure to fully exhaust the Bureau of Prisons' administrative-remedy process and stated that, even if exhaustion had been satisfied, the petition would be denied on the merits.

## DISPOSITION

dismissed

## CASES CITED

- State v. Olson, No. 18-05-K-03159 (N.D. Dist. Ct. Grand Forks Cnty. filed Sept. 19, 2005)
- State v. Olson, No. 18-05-K-03251 (N.D. Dist. Ct. Grand Forks Cnty. filed Sept. 27, 2005)
- State v. Olson, No. 18-08-K-01941 (N.D. Dist. Ct. Grand Forks Cnty. filed Sept. 19, 2008)
- State v. Olson, No. 18-08-K-02287 (N.D. Dist. Ct. Grand Forks Cnty. filed Nov. 6, 2008)
- State v. Olson, No. 18-08-K-02315 (N.D. Dist. Ct. Grand Forks Cnty. filed Nov. 12, 2008)
- State v. Olson, No. 09-09-K-00193 (N.D. Dist. Ct. Cass Cnty. filed Jan. 20, 2009)
- Orabi v. Att'y Gen. of the U.S., 738 F.3d 535, 537 n.1 (3d Cir. 2013)
- Wilson v. McVey, 579 F. Supp. 2d 685, 688 n.5 (M.D. Pa. 2008)
- Cardona v. Bledsoe, 681 F.3d 533, 535 (3d Cir. 2012)
- Woodall v. Fed. Bureau of Prisons, 432 F.3d 235, 241-43 (3d Cir. 2005)
- Barden v. Keohane, 921 F.2d 476, 478-79 (3d Cir. 1990)
- Moscato v. Fed. Bureau of Prisons, 98 F.3d 757, 760-62 (3d Cir. 1996)
- Bradshaw v. Carlson, 682 F.2d 1050, 1052 (3d Cir. 1982)
- Brown v. Warden Canaan USP, 763 F. App'x 296, 297 (3d Cir. 2019)
- Lyons v. U.S. Marshals, 840 F.2d 202, 205 (3d Cir. 1988)
- Meyers v. Martinez, 427 F. App'x 125, 127 (3d Cir. 2011)
- Thompson v. Ricci, 326 F. App'x 116, 118 n.4 (3d Cir. 2009)
- Goodman, 427 F. App'x at 82
- Rashid v. Quintana, 372 F. App'x 260, 262-63 (3d Cir. 2010)
- Taylor v. Holt, 309 F. App'x 591, 592-93 (3d Cir. 2009)
- Pitts v. Spaulding, No. 15-cv-00644, 2015 WL 8482041, at \*4 (M.D. Pa. Dec. 10, 2015)
- Proctor v. Finley, No. 19-630, 2020 WL 618621, at \*3 (M.D. Pa. Feb. 10, 2020)
- Blood v. Bledsoe, 648 F.3d 203, 206 (3d Cir. 2011)
- United States v. Wilson, 503 U.S. 329, 333-35, 337 (1992)
- Vega v. United States, 493 F.3d 310, 314 (3d Cir. 2007)
- Brown v. United States, No. 23-cv-00247, 2025 WL 2146724, at \*3 (W.D. Pa. July 29, 2025)
- Davis v. Pa. Dep't of Corr., No. 15-cv-00587, 2016 WL 7131565, at \*3 (W.D. Pa. Dec. 6, 2016)
- Baptiste v. Morris, No. 18-cv-01484, 2020 WL 2745739, at \*2 n.5 (M.D. Pa. May 27, 2020)

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