

DISTRICT OF COLUMBIA COURT OF APPEALS

Davidson A.K.A. Muhammad v. United States

Davidson · No. 24-CO-295 & 24-CO-296 · Decided January 22, 2026

SUMMARY

The District of Columbia Court of Appeals vacated and remanded the denial of Muhaymin Muhammad’s motion to reduce his sentence under the Incarceration Reduction Amendment Act. The court held that the trial court lacked a sufficient basis to rely on Muhammad’s lack of sex-offender treatment in assessing his current dangerousness, and it cautioned that consideration of a 2016 stalking infraction must account for its nonviolent and nonsexual circumstances. The court rejected Muhammad’s argument that the trial court applied an incorrect burden of proof, while noting that the applicable standard is preponderance of the evidence.

CASE DETAILS

COURT	District of Columbia Court of Appeals
WRITING FOR THE COURT	Blackburne-Rigsby, Chief Judge; Easterly, Associate Judge; Shanker, Associate Judge
JURISDICTION	District of Columbia Court of Appeals
DECIDED	January 22, 2026
DOCKET	24-CO-295 & 24-CO-296
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from the Superior Court of the District of Columbia’s denial of a motion to reduce a sentence under the Incarceration Reduction Amendment Act.
STANDARD OF REVIEW	The denial of an IRAA motion is reviewed for abuse of discretion; statutory-construction questions are reviewed de novo. Abuse-of-discretion review includes determining whether the trial court failed to consider a relevant factor, relied on an improper factor, gave reasons that reasonably support its conclusion, or was guided by erroneous legal conclusions.
PRECEDENTIAL VALUE	published
PARTIES	William D. Davidson, A.K.A. Muhaymin Muhammad v. United States

TOPICS

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QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by relying on Muhammad's lack of sex-offender treatment as a basis for finding that he remained dangerous under the IRAA.
2. Whether the trial court improperly analogized Muhammad's 2016 stalking infraction to his underlying violent and sexual offenses without adequately considering the actual circumstances of that infraction.
3. Whether the trial court applied a burden of proof higher than preponderance of the evidence in evaluating Muhammad's lack of dangerousness.
4. Whether the trial court erred in its interests-of-justice analysis by relying on the seriousness and nature of the underlying offenses as standalone considerations contrary to the IRAA.

HOLDINGS

1. On the record presented, the trial court lacked a sufficient basis to find that Muhammad needed sex-offender treatment to prove that he was not dangerous under the IRAA. Its dangerousness finding was based on an unsubstantiated assumption that he needed and failed to obtain such treatment.
2. The trial court may consider the 2016 stalking infraction, but its consideration must acknowledge that the infraction was a single, nonviolent, nonsexual incident involving repeated administrative complaints rather than physical stalking or attack.
3. The record did not establish that the trial court applied a burden of proof higher than the preponderance-of-the-evidence standard. A single use of the word 'guarantee' was insufficient to overcome the presumption that the trial court applied the proper standard.
4. The trial court erred in relying on the seriousness of Muhammad's offenses as an independent factor in the interests-of-justice analysis because those considerations were outside the IRAA's enumerated factors and contrary to the statute's purpose.

KEY QUOTATIONS

“We hold that, as the record stands, with only the unchallenged expert testimony of Dr. Keller, indicating that he did not need sex offender treatment, but that he instead benefitted from other treatment he received, there was an insufficient basis for the trial court to find that Mr. Muhammad needed sex offender treatment in order to prove his non-dangerousness under the IRAA factors.” (at 12-13)

“The trial court’s dangerousness finding is based on an unsubstantiated assumption that Mr. Muhammad needed and failed to obtain sex offender treatment.” (at 24)

FACTUAL BACKGROUND

Muhammad committed a series of violent offenses over approximately four weeks in 1982, including first-degree murder, rape, and armed robbery, when he was eighteen years old, and received an aggregate sentence of sixty-five years to life. After serving approximately forty-three years, he sought sentence reduction under the IRAA. His incarceration history included substantial educational, vocational, substance-abuse, and faith-based programming, a minimum PATTERN recidivism score, and disciplinary infractions including a 2016 nonviolent stalking infraction involving complaints directed at two female prison employees. The record contained unchallenged expert evidence that sex-offender-specific treatment was not warranted and that other treatment had addressed his prominent risk factors.

PROCEDURAL HISTORY

Muhammad filed an IRAA sentence-reduction motion on July 7, 2023, concerning two 1982 criminal cases. After an evidentiary hearing, the Superior Court denied the motion, finding that Muhammad had not shown that he was no longer dangerous and that the interests of justice warranted a sentence reduction. The District of Columbia Court of Appeals vacated the decision and remanded for a new IRAA analysis.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Vacate the trial court's decision and remand for the trial court to reconduct its IRAA analysis consistent with the opinion, including without assuming that Muhammad needed sex-offender treatment, while accurately considering the circumstances of the 2016 infraction and the statutory interests-of-justice framework.

CASES CITED

- Doe v. United States, 333 A.3d 893 (D.C. 2025)
- Bishop v. United States, 310 A.3d 629 (D.C. 2024)
- Welch v. United States, 319 A.3d 971 (D.C. 2024)
- Riley v. United States, 338 A.3d 1 (D.C. 2025)
- Henny v. United States, 321 A.3d 621 (D.C. 2024)
- A.C. v. N.W., 160 A.3d 509 (D.C. 2017)
- Johnson v. United States, 232 A.3d 156 (D.C. 2020)
- Anderson v. City of Bessemer City, N.C., 470 U.S. 564 (1985)
- Bailey v. United States, 251 A.3d 724 (D.C. 2021)
- In re C.T., 724 A.2d 590 (D.C. 1999)
- Wheeler v. United States, 930 A.2d 232 (D.C. 2007)
- Brooks v. United States, 993 A.2d 1090 (D.C. 2010)