

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
KENTUCKY

Dawn Bennett v. Warden David Paul

No. Civil Action No. 5:25-073-KKC, United States District Court for the Eastern District of Kentucky
(December 18, 2025)

SUMMARY

The United States District Court for the Eastern District of Kentucky denied Dawn Bennett’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court concluded that Bennett had not clearly shown that the Bureau of Prisons incorrectly calculated or applied her First Step Act time credits and rejected her requests for home confinement, compassionate release, relief concerning confinement conditions, and collateral review of her convictions. The action was dismissed and stricken from the court’s docket.

CASE DETAILS

COURT	United States District Court for the Eastern District of Kentucky
JURISDICTION	United States District Court for the Eastern District of Kentucky
DECIDED	December 18, 2025
DOCKET	Civil Action No. 5:25-073-KKC
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, release-date calculations, confinement placement, and related claims.
STANDARD OF REVIEW	The petitioner bears the burden of clearly demonstrating entitlement to habeas relief and showing that the Bureau of Prisons’ calculations are incorrect or inconsistent with applicable law.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

- federal habeas corpus
- post-conviction relief
- prisoners rights
- civil rights

PRACTICE AREAS

- federal habeas corpus
- prisoner litigation
- civil rights

QUESTIONS PRESENTED

1. Whether Bennett demonstrated that the Bureau of Prisons incorrectly calculated or applied her First Step Act time credits.
2. Whether Bennett was entitled to immediate placement in home confinement under 18 U.S.C. §§ 3621(b) and 3624(c).
3. Whether claims seeking compassionate release, challenging conditions of confinement, or collaterally attacking the underlying conviction and sentence were cognizable in a § 2241 petition.

HOLDINGS

1. Bennett was not entitled to habeas relief because she failed to clearly demonstrate that the Bureau of Prisons' comprehensive time-credit assessment was incorrect or inconsistent with applicable law.
2. Bennett was not entitled to immediate home confinement because the Bureau of Prisons has discretion to determine a prisoner's place of confinement.
3. A request for compassionate release must be presented to the sentencing court rather than to the district court adjudicating Bennett's § 2241 petition.
4. Bennett's conditions-of-confinement claims were not cognizable in this habeas action and had to be pursued in a standalone civil-rights action.
5. Claims collaterally attacking Bennett's underlying federal convictions or sentence were not cognizable in this § 2241 proceeding.

KEY QUOTATIONS

“a prisoner is neither entitled nor guaranteed such placement for any minimum amount of time.” (at 2)

FACTUAL BACKGROUND

Bennett is incarcerated at the Federal Medical Center in Lexington, Kentucky, and challenged the Bureau of Prisons' calculation and application of her First Step Act time credits. The government represented that she had earned 945 days of relevant credits, of which 365 days—the applicable statutory maximum—had been applied toward early transfer to supervised release, advancing her release date by one year. The remaining 580 days could potentially be applied toward prerelease custody, but Bennett did not clearly demonstrate that the Bureau of Prisons' assessment was erroneous.

PROCEDURAL HISTORY

Bennett, proceeding pro se and incarcerated at the Federal Medical Center in Lexington, Kentucky, filed a § 2241 petition. The United States Attorney's Office responded, and Bennett filed a reply. The district court denied the petition, denied pending motions as moot, dismissed the action, and struck it from the docket.

DISPOSITION

dismissed

CASES CITED

- Schmutzler v. Quintana, No. 5:19-cv-046-DCR, 2019 WL 727794, at *2 (E.D. Ky. Feb. 20, 2019)
- Martin v. LeMaster, No. 21-6247, 2022 WL 18145207, at *2 (6th Cir. Oct. 19, 2022)
- Wilson v. Williams, 961 F.3d 829, 837-38 (6th Cir. 2020)
- Cox v. United States, No. 23-3966, 2024 WL 4948683, at *1 (6th Cir. Apr. 17, 2024)

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