

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Naim Taylor v. Warden of FCI Schuylkill

Civil Action No. 3:26-408 (M.D. Pa. Mar. 24, 2026) · No. 3:26-408 · Decided March 2, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed with prejudice Naim Taylor’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. Taylor challenged the Bureau of Prisons’ determination that his firearm enhancement made him ineligible for a sentence reduction upon completion of the Residential Drug Abuse Treatment Program. The court held that the Supreme Court’s decision in *Lopez v. Davis* foreclosed his challenge to the relevant BOP regulation and policies.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Malachy E. Mannion
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 2, 2026
DOCKET	3:26-408
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal prisoner Naim Taylor filed a pro se petition under 28 U.S.C. § 2241 challenging the Bureau of Prisons' determination that his firearm-related sentencing enhancement rendered him ineligible for a possible sentence reduction after completing the Residential Drug Abuse Treatment Program.
STANDARD OF REVIEW	The court screened the habeas petition under Rule 4 and dismissed it summarily because it plainly appeared from the petition and attached documents that Taylor was not entitled to relief.
PRECEDENTIAL VALUE	Unknown; district court memorandum opinion
PARTIES	Naim Taylor v. Warden of FCI Schuylkill

TOPICS

federal habeas corpus

sentence modification

statutory interpretation

administrative law

post-conviction relief

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Administrative law

Sentencing

QUESTIONS PRESENTED

1. Whether the BOP's regulation, 28 C.F.R. § 550.55(b)(5)(ii), exceeded the BOP's statutory authority or conflicted with 18 U.S.C. § 3621(e)(2)(B) by categorically excluding inmates whose felony offense involved carrying, possessing, or using a firearm from consideration for an RDAP sentence reduction.
2. Whether the BOP could rely on Taylor's two-level USSG § 2D1.1(b)(1) firearm-possession enhancement to deny eligibility for an RDAP sentence reduction.
3. Whether Taylor was entitled to relief under 28 U.S.C. § 2241.

HOLDINGS

1. The BOP may exercise its statutory discretion to categorically exclude inmates whose current felony offense involved carrying, possessing, or using a firearm from eligibility for an early-release sentence reduction under 18 U.S.C. § 3621(e)(2)(B).
2. Taylor's two-level firearm-possession enhancement did not entitle him to an RDAP sentence reduction or invalidate the BOP's exclusion of him from early-release consideration.
3. Taylor was not entitled to habeas relief because the face of his petition and its attachments showed that his challenge was foreclosed by controlling precedent.

KEY QUOTATIONS

"Therefore, 'Lopez controls this [C]ourt's analysis and compels the [C]ourt to [dismiss Taylor's] petition because [Lopez] upholds the validity of an earlier regulation that is identical in all relevant respects to the regulation [Taylor] challenges' here." (at 10-11)

"Accordingly, because it plainly appears from Taylor's petition and the documents attached thereto that he is not entitled to habeas relief, the Court will dismiss Taylor's Section 2241 petition with prejudice." (at 16)

FACTUAL BACKGROUND

Taylor pleaded guilty to possessing with intent to distribute forty grams or more of fentanyl and a detectable amount of cocaine. The sentencing court imposed an aggregate 96-month federal sentence and applied a two-level USSG § 2D1.1(b)(1) enhancement because Taylor possessed firearms in connection with his drug-trafficking offense. While participating in the BOP's Residential Drug Abuse Treatment Program, Taylor was informed that the firearm-related enhancement made him ineligible for a possible sentence reduction of up to one year under 18 U.S.C. § 3621(e)(2)(B).

PROCEDURAL HISTORY

Taylor pleaded guilty in the Middle District of Pennsylvania to possessing with intent to distribute fentanyl and cocaine and received a 96-month sentence. The sentencing court applied a two-level enhancement under USSG § 2D1.1(b)(1) for firearm possession. Taylor filed this § 2241 petition on February 18, 2026, asserting that the BOP's regulation and Program Statement exceeded statutory authority and conflicted with 18 U.S.C. § 3621(e)(2)(B). The district court screened the petition under Rule 4 and dismissed it with prejudice.

DISPOSITION

dismissed

CASES CITED

- United States v. Taylor, No. 21-cr-172-01 (M.D. Pa.)
- Orabi v. Attorney General of the United States, 738 F.3d 535, 537 (3d Cir. 2014)
- Lonchar v. Thomas, 517 U.S. 314, 320 (1996)
- McFarland v. Scott, 512 U.S. 849, 856 (1994)
- Cardona v. Bledsoe, 681 F.3d 533, 535 (3d Cir. 2012)
- Woodall v. Federal Bureau of Prisons, 432 F.3d 235, 241-43 (3d Cir. 2005)
- Barden v. Keohane, 921 F.2d 476, 478-79 (3d Cir. 1990)
- United States v. Davis, 2025 WL 84214, at *1 n.3 (W.D. Va. Jan. 13, 2025)
- United States v. James, 151 F.4th 28, 43 (2d Cir. 2025)
- Reeb v. Thomas, 636 F.3d 1224, 1225 (9th Cir. 2011)
- Jenkins v. Greene, 2025 WL 2796766, at *1-2 (M.D. Pa. Sept. 29, 2025)
- Romero v. Warden F.C.I. Marianna, 2025 WL 2394887, at *2 (N.D. Fla. July 23, 2025), report and recommendation adopted, 2025 WL 2394347 (N.D. Fla. Aug. 18, 2025)
- Bains v. Quay, 2021 WL 5343485, at *8 n.22 (M.D. Pa. Oct. 27, 2021), report and recommendation adopted, 2021 WL 5330841 (M.D. Pa. Nov. 16, 2021)
- Lopez v. Davis, 531 U.S. 230, 232-44 (2001)
- Hendricks v. Jenkins, 2020 WL 5430821, at *4 (N.D. Cal. Sept. 10, 2020)
- Arrington v. Daniels, 516 F.3d 1106, 1112 (9th Cir. 2008)
- Walton v. Montgomery County Community College, 2025 WL 345087, at *3 n.4 (E.D. Pa. Jan. 30, 2025)
- Gardner v. Grandolsky, 585 F.3d 786, 790, 793 (3d Cir. 2009)
- Roussos v. Menifee, 122 F.3d 159, 160-64 (3d Cir. 1997)
- Muolo v. Quintana, 593 F. Supp. 2d 776, 780 (W.D. Pa.), aff'd, 345 F. App'x 736 (3d Cir. 2009) (unpublished)
- Britt v. Plumley, 787 F. App'x 431, 431-32 (9th Cir. 2019) (unpublished)
- Greene-McNeil v. Warden, 2025 WL 2740400, at *10 (S.D.W. Va. June 9, 2025), report and recommendation adopted, 2025 WL 2736924 (S.D.W. Va. Sept. 25, 2025)