

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Kareem Shaw v. E. Rardin

Case No. 25-cv-10209 · No. 2:25-cv-10209 · Decided January 30, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan denied Kareem Shaw’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that the Bureau of Prisons properly aggregated Shaw’s consecutive sentences under 18 U.S.C. § 3584(c) and correctly determined that his conviction for escape under 18 U.S.C. § 751(a) made him ineligible for First Step Act time credits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Denise Page Hood
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	January 30, 2026
DOCKET	2:25-cv-10209
DISPOSITION	denied
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 from the Bureau of Prisons' determination that he was ineligible for earned time credits under the First Step Act. The district court denied the petition.
STANDARD OF REVIEW	The court reviewed the § 2241 challenge to the BOP's sentence-credit determination and applied the governing statutory provisions to determine whether the BOP's calculation was lawful.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Kareem Shaw v. E. Rardin

TOPICS

- federal habeas corpus
- post-conviction relief
- statutory interpretation
- administrative law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether 18 U.S.C. § 3584(c) required the BOP to treat Shaw's consecutive sentences from separate criminal cases as a single aggregate term for administrative purposes.
2. Whether the aggregated sentence rendered Shaw ineligible for First Step Act earned time credits under 18 U.S.C. § 3632(d)(4)(D), because one of the convictions was for escape under 18 U.S.C. § 751(a).

HOLDINGS

1. The BOP properly aggregated Shaw's consecutive escape sentence with his drug-conspiracy sentence for administrative purposes under 18 U.S.C. § 3584(c), including for determining eligibility for First Step Act time credits.
2. Shaw was ineligible for First Step Act earned time credits because his aggregated sentence included a conviction for escape under 18 U.S.C. § 751(a), a disqualifying offense under 18 U.S.C. § 3632(d)(4)(D) (xiv).

KEY QUOTATIONS

“Multiple terms of imprisonment ordered to run consecutively or concurrently shall be treated for administrative purposes as a single, aggregate term of imprisonment.” (III)

“The Court concludes that the BOP’s calculation is correct.” (III)

“Accordingly, the BOP properly denied Petitioner FSA credits based on his 2022 conviction for escaping from custody, in violation of 18 U.S.C. § 751(a), because prisoners are not eligible to receive these earned time credits if they are serving a sentence for a conviction under § 3632(d)(4)(D).” (IV)

FACTUAL BACKGROUND

Shaw was sentenced in 2015 to 216 months' imprisonment for heroin-distribution conspiracy. In 2022, he received an additional eight-month sentence for escaping from custody, ordered to run consecutively to the earlier sentence. The BOP administratively aggregated the sentences and determined that Shaw was ineligible for First Step Act time credits because the escape conviction under 18 U.S.C. § 751(a) is a disqualifying offense.

PROCEDURAL HISTORY

Shaw filed a § 2241 petition on January 23, 2025, challenging the BOP's aggregation of his consecutive federal sentences for purposes of determining eligibility for First Step Act time credits. The respondent opposed the petition. The Eastern District of Michigan denied habeas relief and closed the case.

DISPOSITION

denied

CASES CITED

- United States v. Shaw, Case No. 13-cr-00025, Doc. 670 (W.D. Va.)
- United States v. Shaw, Case No. 22-cr-00105, Doc. 29 (E.D. Va.)
- Keeling v. Lemaster, 2023 WL 9061914, at *1 (6th Cir. Nov. 22, 2023)
- Sok v. Eischen, 2022 WL 17156797, at *5 (D. Minn. Oct. 26, 2022)
- Hargrove v. Healy, 2024 WL 3992261, at *4-5 (N.D. Ohio Aug. 28, 2024)
- Andrews v. Rardin, 2024 WL 3236249, at *3 (E.D. Mich. June 28, 2024)
- Martinez v. Rosalez, No. 23-50406, 2024 WL 140438, at *3 (5th Cir. Jan. 12, 2024)
- Witham v. United States, 355 F.3d 501, 504 (6th Cir. 2004)

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