

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Christopher Mathers v. Warden, FCI Greenville

Mathers v. Warden, FCI Greenville, No. 26-CV-00031-SPM (S.D. Ill. Feb. 10, 2026) · No. 26-CV-00031-SPM ·
Decided February 10, 2026

SUMMARY

The United States District Court for the Southern District of Illinois dismissed Christopher Mathers’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ assignment of PATTERN recidivism score points. The court held that the challenge was not cognizable in habeas because it did not presently affect the validity or duration of Mathers’s confinement. The court also held that Mathers had failed to exhaust the Bureau of Prisons’ administrative-remedy process, and dismissed the petition without prejudice.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Stephen P. McGlynn
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	February 10, 2026
DOCKET	26-CV-00031-SPM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241, reviewed preliminarily under Rule 4 and dismissed without prejudice.
STANDARD OF REVIEW	Preliminary review under Rule 4 of the Rules Governing Section 2254 Cases, as applied to a § 2241 petition through Rule 1(b); dismissal is authorized when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	Nonprecedential district court memorandum and order
PARTIES	Christopher Mathers v. Warden, FCI Greenville

TOPICS

- federal habeas corpus
- exhaustion of remedies
- post-conviction relief
- administrative law

PRACTICE AREAS

Federal habeas corpus

Federal prisoners

Administrative exhaustion

First Step Act

QUESTIONS PRESENTED

1. Whether a challenge to the BOP's assignment of PATTERN recidivism-score points, assertedly affecting the rate of earning First Step Act time credits, is cognizable in a § 2241 habeas petition.
2. Whether the petition had to be dismissed for failure to exhaust the BOP's four-tier administrative-remedy process.

HOLDINGS

1. A challenge to the BOP's assignment of PATTERN recidivism-score points is not cognizable in a habeas petition because the alleged scoring error does not, on the facts alleged, challenge the validity or duration of confinement or presently entitle the petitioner to earlier release or other custody-related relief.
2. The petition was independently subject to dismissal because Mathers did not allege that he completed the BOP's required administrative-remedy process before filing his § 2241 petition.

KEY QUOTATIONS

“habeas is the proper vehicle for presenting a claim “only if the prisoner is seeking to ‘get out’ of custody in some meaningful sense”” (Discussion)

“For the reasons set forth herein, Christopher Mathers's Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 is DISMISSED without prejudice.” (Conclusion)

FACTUAL BACKGROUND

Mathers, a federal inmate at FCI Greenville, challenged the BOP's assignment of six PATTERN recidivism points for absconding. He contended that BOP Policy 5100.08 required a finding of guilt for assessing points based on a history of escape and that his presentence investigation report did not support the assignment. He asserted that removal of the points could lower his PATTERN classification and affect the rate at which he earns First Step Act time credits, although some anticipated credits had not yet been earned.

PROCEDURAL HISTORY

Mathers pleaded guilty in federal court to possession of methamphetamine with intent to distribute and was sentenced to 150 months' imprisonment followed by five years of supervised release. He did not file a direct appeal or a motion under 28 U.S.C. § 2255. He filed this § 2241 petition on January 12, 2026, challenging the Bureau of Prisons' assignment of PATTERN recidivism-score points; the district court dismissed the petition without prejudice because the claim was not cognizable in habeas and, independently, because Mathers had not exhausted available BOP administrative remedies.

DISPOSITION

dismissed

CASES CITED

- Keller v. Watson, 740 F. App'x 97, 97 (7th Cir. 2018)
- Preiser v. Rodriguez, 411 U.S. 475, 490 (1973)
- Ihmoud v. Jett, 272 F. App'x 525, 526 (7th Cir. 2008)
- Richmond v. Scibana, 387 F.3d 602, 604 (7th Cir. 2004)
- Sewell v. United States, No. 1:22-1420-MMM, 2023 WL 1110289, at *2 (C.D. Ill. Jan. 30, 2023)
- Pozo v. McCaughtry, 286 F.3d 1022, 1025 (7th Cir. 2002)
- Pischke v. Litscher, 178 F.3d 497, 499-500 (7th Cir. 1999)
- Lallave v. Martinez, 609 F. Supp. 3d 164, 183 (E.D.N.Y. June 29, 2022)
- Garcia v. Emmerich, No. 25-CV-323-WMC, 2025 WL 1859156, at *1 (W.D. Wis. June 18, 2025)
- Beam, 2025 WL 1359903, at *1
- Gonzalez v. O'Connell, 355 F.3d 1010, 1016 (7th Cir. 2004)
- Moon v. Walton, No. 12-CV-636-DRH-DGW, 2013 WL 3453691, at *3 (S.D. Ill. July 9, 2013)
- Kaba v. Stepp, 458 F.3d 678, 684 (7th Cir. 2006)
- Glisson v. U.S. Forest Serv., 55 F.3d 1325, 1327 (7th Cir. 1995)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024)
- Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984)

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