

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Stanley v. United States

Civil Action No. 24-2647-TDC, Crim. Action No. 22-0458-TDC (D. Md. Mar. 30, 2026) · No. Civil Action No. 24-2647-TDC; Crim. Action No. 22-0458-TDC · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Maryland denied Randolph Stanley’s motion under 28 U.S.C. § 2255 to vacate, set aside, or correct his sentence. The court rejected his ineffective-assistance claims concerning factual errors, the loss and restitution amounts, and the presentation of family circumstances at sentencing. The court also declined to issue a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Theodore D. Chuang
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 31, 2026
DOCKET	Civil Action No. 24-2647-TDC; Crim. Action No. 22-0458-TDC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Stanley moved under 28 U.S.C. § 2255 to vacate, set aside, or correct his sentence based on alleged ineffective assistance of counsel. The district court denied the motion without an evidentiary hearing and declined to issue a certificate of appealability.
STANDARD OF REVIEW	A § 2255 movant bears the burden of proving entitlement to relief by a preponderance of the evidence. Ineffective-assistance claims are governed by Strickland's deficient-performance and prejudice requirements. An evidentiary hearing is unnecessary when the existing record conclusively shows that the movant is not entitled to relief, including when claims contradict sworn statements made during a properly conducted Rule 11 colloquy.
PRECEDENTIAL VALUE	unpublished district court memorandum; precedential status not stated
PARTIES	Randolph Stanley v. United States of America

TOPICS

federal habeas corpus

post-conviction relief

ineffective assistance

sentencing

plea bargaining

PRACTICE AREAS

federal post-conviction relief

criminal procedure

sentencing

ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether Stanley received ineffective assistance of counsel because counsel failed to object to or correct alleged factual errors concerning the loss amount, restitution amount, and Stanley's managerial role.
2. Whether counsel was ineffective for failing to negotiate or contest the loss and restitution amounts on the ground that the Guidelines loss amount should have been based only on actual loss.
3. Whether counsel was ineffective for failing to present additional mitigating evidence concerning Stanley's family circumstances at sentencing.
4. Whether Stanley was entitled to an evidentiary hearing on his § 2255 claims.
5. Whether Stanley was entitled to a certificate of appealability.

HOLDINGS

1. Counsel was not ineffective for failing to contest facts that Stanley had repeatedly admitted in the plea agreement, stipulation of facts, and sworn guilty-plea colloquy, including the loss amount, restitution basis, and managerial role enhancement.
2. Counsel was not ineffective for failing to argue that the Guidelines loss amount should be limited to actual loss because the stipulated actual loss exceeded \$5.6 million and would not have changed the Guidelines offense level.
3. Counsel's performance was not deficient, and Stanley could not establish prejudice, where counsel and the presentence report presented substantial information about Stanley's wife, children, disabled brother, and deceased father, and counsel argued the impact of imprisonment on his family.
4. No evidentiary hearing was required because the existing record resolved the claims without the need to resolve disputed facts or make credibility determinations.
5. Stanley was not entitled to a certificate of appealability because he failed to make a substantial showing of the denial of a constitutional right and reasonable jurists would not find the court's assessment debatable or wrong.

KEY QUOTATIONS

"For the reasons set forth below, the § 2255 Motion will be DENIED." (1)

"Where Stanley had admitted these facts multiple times, including under oath in open court, there was no basis upon which defense counsel could have contested the loss amount or Stanley's role at sentencing." (10)

"In light of the Court's view of this case and reasons for its sentence, the Court finds that Stanley has not demonstrated a reasonable probability that had defense counsel presented specific argument relating to Stanley's brother, father's estate, or both, the result of his sentence would have been different." (13)

FACTUAL BACKGROUND

Stanley participated as a manager or supervisor in a scheme that recruited more than 60 students to obtain federal student loans through false statements and forgery while completing academic coursework for them. The scheme caused the Department of Education to disburse at least \$5,830,639, of which more than \$5,652,292 remained outstanding. Stanley pleaded guilty pursuant to an agreement incorporating these facts and later received a 48-month sentence, a substantial downward variance from the applicable Guidelines range, and restitution of \$5,648,238.

PROCEDURAL HISTORY

Stanley pleaded guilty in the underlying criminal action to conspiracy to commit wire fraud and student loan fraud and student loan fraud. The court sentenced him to 48 months of imprisonment, followed by 36 months of supervised release, and ordered restitution of \$5,648,238. Stanley then filed this § 2255 motion alleging ineffective assistance relating to factual errors, the loss and restitution amounts, and presentation of mitigating family circumstances.

DISPOSITION

dismissed

CASES CITED

- Miller v. United States, 261 F.2d 546, 547 (4th Cir. 1958)
- United States v. Witherspoon, 231 F.3d 923, 927 (4th Cir. 2000)
- United States v. Lemaster, 403 F.3d 216, 221-22 (4th Cir. 2005)
- Strickland v. Washington, 466 U.S. 668, 687-94 (1984)
- Wiggins v. Smith, 539 U.S. 510, 521 (2003)
- Berghuis v. Thompson, 560 U.S. 370, 390 (2010)
- Campbell v. Polk, 447 F.3d 270, 282 (4th Cir. 2006)
- Holiday v. United States, No. DKC-08-2341, 2011 WL 3476567, at *3 (D. Md. Aug. 8, 2011)
- Rose v. Lee, 252 F.3d 676, 684 (4th Cir. 2001)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)