

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Kareem Al-Jaml Young v. B. M. Trate

Young v. Trate · No. 1:23-cv-00055-TLN-CDB (HC) · Decided June 16, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends dismissing Kareem Al-Jaml Young’s petition for a writ of habeas corpus under 28 U.S.C. § 2241 for lack of jurisdiction. The court concludes that Young’s challenges to his federal sentence must be pursued under 28 U.S.C. § 2255 in the sentencing court and that he has not shown unusual circumstances permitting resort to § 2241. The court also declines to transfer the petition because substantially identical claims were already pending in the Northern District of Alabama.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 16, 2025
DOCKET	1:23-cv-00055-TLN-CDB (HC)
DISPOSITION	other
PROCEDURAL POSTURE	A federal prisoner filed a petition under 28 U.S.C. § 2241 challenging the validity of his federal conviction and sentence. The magistrate judge issued findings and recommendations that the petition be dismissed for lack of jurisdiction, subject to review by the assigned district judge after any objections.
STANDARD OF REVIEW	On preliminary screening, a habeas petition may be summarily dismissed if it plainly appears that the petitioner is not entitled to relief. A petition should not be dismissed without leave to amend unless no tenable claim for relief could be pleaded. Jurisdiction under § 2241 was reviewed under the statutory framework governing the § 2255 savings clause.
PRECEDENTIAL VALUE	Nonprecedential magistrate judge findings and recommendations; not a final merits opinion.
PARTIES	Kareem Al-Jaml Young v. B. M. Trate

TOPICS

federal habeas corpus

subject matter jurisdiction

post-conviction relief

actual innocence

sentencing

PRACTICE AREAS

Federal habeas corpus

Federal post-conviction relief

Federal sentencing

QUESTIONS PRESENTED

1. Whether the Eastern District of California had jurisdiction under 28 U.S.C. § 2241 to consider a federal prisoner's challenge to the validity of his federal conviction and sentence.
2. Whether petitioner demonstrated that the remedy under 28 U.S.C. § 2255 was inadequate or ineffective because unusual circumstances made it impossible or impracticable to seek relief in the sentencing court.
3. Whether the pending § 2255 proceedings in the Northern District of Alabama made transfer of the § 2241 petition appropriate under 28 U.S.C. § 1631.

HOLDINGS

1. The Eastern District of California lacked jurisdiction because petitioner did not establish that the § 2255 remedy was inadequate or ineffective within the meaning of the savings clause.
2. Petitioner's inability to satisfy the requirements for a successive § 2255 motion based on his Erlinger claim did not permit him to proceed under § 2241.
3. Transfer was not in the interests of justice because petitioner was already litigating substantially identical claims in the Northern District of Alabama, making transfer futile.

KEY QUOTATIONS

“The inability of a prisoner with a statutory claim to satisfy those conditions does not mean that he can bring his claim in a habeas petition under the saving clause. It means that he cannot bring it at all.” (at 6)

FACTUAL BACKGROUND

Petitioner was convicted in the Northern District of Alabama of possessing a firearm as a prohibited person under 18 U.S.C. § 922(g)(1) and was sentenced to 188 months based in part on an Armed Career Criminal Act enhancement. The sentencing court treated two Alabama robbery convictions and an unlawful-distribution conviction as ACCA predicate offenses. On direct appeal, petitioner challenged only the denial of counsel's request to withdraw, and the Eleventh Circuit affirmed. He later filed § 2255 motions in the sentencing court asserting that his ACCA enhancement was invalid and raising additional claims, while his § 2241 petition in the Eastern District of California challenged the use of his unlawful-distribution conviction as an ACCA predicate.

PROCEDURAL HISTORY

Petitioner was convicted and sentenced in the United States District Court for the Northern District of Alabama and his conviction and sentence were affirmed on direct appeal by the Eleventh Circuit. He filed this § 2241 petition in the Eastern District of California before filing a § 2255 motion in the sentencing court. He later filed

first, supplemental, and amended § 2255 motions in the Northern District of Alabama, which remained pending. The magistrate judge recommended dismissal of the § 2241 petition because the petitioner failed to establish that § 2255 was inadequate or ineffective and because transfer would be futile.

DISPOSITION

other

CASES CITED

- United States v. Young, No. 21-11907, 2023 WL 6213488 (11th Cir. Sept. 25, 2023)
- Erlinger v. United States, 602 U.S. 821 (2024)
- United States v. Walton, 881 F.3d 768 (9th Cir. 2018)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Hendricks v. Vasquez, 908 F.2d 490, 491 (9th Cir. 1990)
- Mayle v. Felix, 545 U.S. 644, 655 (2005)
- Jarvis v. Nelson, 440 F.2d 13, 14 (9th Cir. 1971) (per curiam)
- Stephens v. Herrera, 464 F.3d 895, 897-98 (9th Cir. 2006)
- Tripathi v. Henman, 843 F.2d 1160, 1162-63 (9th Cir. 1988)
- Harrison v. Ollison, 519 F.3d 952, 956, 959 (9th Cir. 2008)
- Marrero v. Ives, 682 F.3d 1190, 1192 (9th Cir. 2012)
- Ivy v. Pontesso, 328 F.3d 1057, 1059-60 (9th Cir. 2003)
- Moore v. Reno, 185 F.3d 1054, 1055 (9th Cir. 1999) (per curiam)
- Redfield v. United States, 315 F.2d 76, 83 (9th Cir. 1963)
- Jones v. Hendrix, 599 U.S. 465, 478-80 (2023)
- United States v. Pirro, 104 F.3d 297, 299 (9th Cir. 1997)
- Miller v. Hambrick, 905 F.2d 259, 262 (9th Cir. 1990)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)