

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Domingo Beato-Estrella v. M. Arviza

Beato-Estrella · No. 3:26-CV-245 · Decided March 16, 2026

SUMMARY

The court dismissed without prejudice a pro se federal habeas petition challenging an ICE immigration detainer. The court held that the petitioner had not identified any aspect of his sentence being improperly executed, and that his claims concerning earned time credits and residential reentry or community custody placement were either unavailable or premature. The court also addressed several apparently fabricated or misidentified authorities cited by the petitioner.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Keli M. Neary
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 16, 2026
DOCKET	3:26-CV-245
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner brought a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241, challenging an ICE immigration detainer and its alleged effects on sentence-related programs. The court dismissed the petition without prejudice for lack of subject matter jurisdiction.
STANDARD OF REVIEW	The court assessed whether the petition alleged a cognizable challenge to the execution of the sentence and whether the court had subject matter jurisdiction over the habeas claim.
PRECEDENTIAL VALUE	Nonprecedential district court memorandum
PARTIES	Domingo Beato-Estrella v. M. Arviza

TOPICS

- federal habeas corpus
- immigration detention
- subject matter jurisdiction
- removal proceedings
- post-conviction relief

PRACTICE AREAS

immigration

federal habeas corpus

civil procedure

QUESTIONS PRESENTED

1. Whether the petition presented a cognizable habeas challenge to the execution of petitioner's sentence.
2. Whether the alleged denial of good-time credits, Residential Reentry Center placement, or community custody established a present basis for habeas jurisdiction.
3. Whether the court had subject matter jurisdiction over the petition.

HOLDINGS

1. A federal prisoner may proceed by habeas corpus to challenge execution of a sentence only by identifying Bureau of Prisons action inconsistent with a command or recommendation in the sentencing judgment.
2. The asserted denial of good-time credits did not support habeas relief because petitioner was ineligible for those credits under 18 U.S.C. § 3632(d)(4)(D)(lxvi).
3. The placement claim was premature because no placement decision had been made and petitioner was not yet eligible for placement during the final year of his term of imprisonment.
4. The court lacked subject matter jurisdiction because petitioner identified no unlawful interference with execution of his sentence and no presently available program from which the detainer deprived him.

KEY QUOTATIONS

“To challenge the execution of a sentence, a prisoner must show the Bureau of Prisons (“BOP”) is taking some action that is “inconsistent with a command or recommendation in the sentencing judgment.””

“Therefore, this matter will be dismissed without prejudice for lack of subject matter jurisdiction.”

FACTUAL BACKGROUND

Beato-Estrella, a federal prisoner, sought removal of an ICE detainer, asserting that it prevented him from earning time credits, receiving meaningful consideration for Residential Reentry Center placement, and potentially transferring to community custody. He was ineligible for good-time credits because of his fentanyl-distribution conviction, and he had more than a decade remaining on his sentence, making him ineligible for residential reentry or community-custody placement at that time. He did not identify any command or recommendation in his original sentencing judgment that the Bureau of Prisons had failed to carry out.

PROCEDURAL HISTORY

Beato-Estrella filed a habeas petition naming G. Swaney as respondent. Counsel clarified that M. Arviza had become the warden of the facility housing petitioner. After considering the petition, the response, and petitioner's reply, the court concluded that petitioner had not identified any Bureau of Prisons action inconsistent with his sentencing judgment and that his asserted program-related injuries were either unavailable or premature.

DISPOSITION

dismissed

CASES CITED

- Cardona v. Bledsoe, 681 F.3d 533, 535, 537 (3d Cir. 2012)
- Woodall v. Federal Bureau of Prisons, 432 F.3d 235, 241 (3d Cir. 2005)
- Galarza v. Szalczyk, 745 F.3d 634, 640 (3d Cir. 2014)
- Santos v. Warden Allenwood FCI, No. 1:17-CV-02116, 2018 WL 1178251 (M.D. Pa. Mar. 6, 2018)
- Rodriguez v. Ebbert, No. 3:14-CV-02404, 2015 WL 1810315 (M.D. Pa. Apr. 21, 2015)
- Cruz v. United States, No. 1:16-CV-01034, 2016 WL 8732312 (M.D. Pa. Dec. 16, 2016)
- Certain Underwriters at Lloyd's, London v. Pettit, No. C17-259RSM, 2018 WL 1178251 (W.D. Wash. Mar. 6, 2018)
- D.S. v. Department of Children & Families, 164 So. 3d 29 (Fla. Dist. Ct. App. 2015)
- Black Water Management, LLC v. Sprenkle, No. 3:15CV365, 2016 WL 8732312 (E.D. Va. Sept. 30, 2016), aff'd, 691 F. App'x 715 (4th Cir. 2017)
- Firestone v. Rockovich, No. 1:17-CV-2116, 2018 WL 347728 (M.D. Pa. Jan. 10, 2018)
- Fagal v. Marywood University, No. 3:14-CV-02404, 2018 WL 1993790 (M.D. Pa. Apr. 27, 2018), aff'd, 786 F. App'x 353 (3d Cir. 2019)
- Drake v. Warden of Allenwood Low, No. 1:16-CV-01034, 2016 WL 7324529 (M.D. Pa. Dec. 16, 2016)
- Benjamin v. Costco Wholesale Corp., 779 F. Supp. 3d 341, 342 (E.D.N.Y. 2025)

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