

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

Andre E. Hamilton v. Warden Greene

Hamilton · No. 1:25-CV-01434 · Decided November 26, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Andre E. Hamilton’s 28 U.S.C. § 2241 petition as moot. Hamilton had sought application of earned time credits under the First Step Act but was released from federal custody while the petition was pending. The court concluded that Hamilton failed to demonstrate continuing collateral consequences after being ordered to show cause why the petition should not be dismissed.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                                                                                                |
| WRITING FOR THE COURT | Jennifer P. Wilson                                                                                                                                                                                                                                                                                                                                                  |
| JURISDICTION          | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                                                                                                |
| DECIDED               | November 26, 2025                                                                                                                                                                                                                                                                                                                                                   |
| DOCKET                | 1:25-CV-01434                                                                                                                                                                                                                                                                                                                                                       |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE    | Petitioner filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241 seeking application of earned time credits under the First Step Act. After the petitioner was released from federal custody, the court ordered him to show cause why the petition should not be dismissed as moot. He did not respond, and the court dismissed the petition as moot. |
| STANDARD OF REVIEW    | The court considered mootness under Article III's case-or-controversy requirement and whether the petitioner continued to suffer secondary or collateral consequences that a favorable decision could redress.                                                                                                                                                      |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                                                                                                                     |
| PARTIES               | Andre E. Hamilton v. Warden Greene                                                                                                                                                                                                                                                                                                                                  |

TOPICS

- federal habeas corpus
- post-conviction relief
- subject matter jurisdiction
- constitutional law

## PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Constitutional law

## QUESTIONS PRESENTED

1. Whether Hamilton's § 2241 petition became moot after his release from federal custody.
2. Whether Hamilton demonstrated secondary or collateral consequences of his federal sentence sufficient to preserve an Article III case or controversy.

## HOLDINGS

1. A habeas corpus petition generally becomes moot when the petitioner is released from custody because the petitioner has received the relief sought, unless a live controversy remains through cognizable secondary or collateral consequences.
2. After release from custody, collateral consequences are not presumed; the petitioner must show that a favorable decision would likely redress a continuing injury, and a mere possibility of collateral consequences is insufficient.

## KEY QUOTATIONS

*“Article III of the [United States] Constitution limits federal ‘judicial Power’ to the adjudication of ‘Cases’ or ‘Controversies.’”* (at 2)

*“Once a petitioner has been released, however, the Court does “not presume that a conviction carries collateral consequences.””* (at 3)

*“It is not enough if ‘collateral consequences proffered by the petitioner’ amount to ‘a possibility rather than a certainty or even a probability.’”* (at 3)

## FACTUAL BACKGROUND

Hamilton was incarcerated at FCI Allenwood and sought application of earned time credits under the First Step Act through a § 2241 petition. The Bureau of Prisons inmate locator showed that he was released from federal custody on October 6, 2025. After the court gave him an opportunity to demonstrate continuing collateral consequences of his sentence, Hamilton did not respond.

## PROCEDURAL HISTORY

Hamilton filed the § 2241 petition on July 29, 2025, and the court received it on August 4, 2025. The respondent filed a response, and Hamilton filed a traverse. After reviewing the Bureau of Prisons inmate locator, the court determined that Hamilton had been released from federal custody on October 6, 2025, issued an order to show cause, and forwarded that order to his updated address. Hamilton failed to demonstrate continuing collateral consequences, so the court dismissed the petition as moot.

## DISPOSITION

dismissed

#### CASES CITED

- Abreu v. Superintendent Smithfield SCI, 971 F.3d 403, 406 (3d Cir. 2020)
- Toll Bros., Inc. v. Township of Readington, 555 F.3d 131, 137 (3d Cir. 2009)
- DeFoy v. McCullough, 393 F.3d 439, 441-42 (3d Cir. 2005)
- Lewis v. Continental Bank Corp., 494 U.S. 472, 477 (1990)
- Burkey v. Marberry, 556 F.3d 142, 148 (3d Cir. 2009)
- United States v. Jackson, 523 F.3d 234, 242 (3d Cir. 2008)

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