

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Edgar Manuel Sierra-Serrano v. Warden, FCI Sandstone

Sierra-Serrano · No. No. 25-cv-2274 (KMM/EMB) · Decided March 24, 2026

SUMMARY

The United States District Court for the District of Minnesota adopts a magistrate judge’s Report and Recommendation and denies Edgar Manuel Sierra-Serrano’s habeas petition concerning the calculation of good conduct time, First Step Act credits, Second Chance Act credits, and his projected Conditional Transition to Community date. The court concludes that the alleged future injury is speculative and dismisses the petition without prejudice for lack of jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Katherine M. Menendez
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	March 24, 2026
DOCKET	No. 25-cv-2274 (KMM/EMB)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief concerning the calculation of good-conduct time, First Step Act time credits, Second Chance Act credits, and his projected Conditional Transition to Community date. The matter was referred to a magistrate judge, whose Report and Recommendation recommended denial. After petitioner filed no objections, the district court reviewed the recommendation for clear error, adopted it, denied the petition, and dismissed the matter without prejudice.
STANDARD OF REVIEW	In the absence of objections, the district court reviews a magistrate judge's Report and Recommendation for clear error.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Edgar Manuel Sierra-Serrano v. Warden, FCI Sandstone

TOPICS

- federal habeas corpus
- standing
- subject matter jurisdiction
- post-conviction relief
- civil procedure

PRACTICE AREAS

federal habeas corpus

federal jurisdiction

prisoner litigation

post-conviction relief

QUESTIONS PRESENTED

1. Whether the petition presented an actual case or controversy under Article III when the claimed injury depended on uncertain future events and discretionary Bureau of Prisons action.
2. Whether the petition should be dismissed without prejudice when the court lacked jurisdiction because the asserted harm was speculative.
3. Whether the court or Clerk's Office could calculate the petitioner's First Step Act credits based on the information before the court.

HOLDINGS

1. A petitioner's claim concerning future prison-credit calculations and a projected transition date does not establish Article III standing when the alleged harm depends on events that may or may not occur and on discretionary Bureau of Prisons action.
2. Dismissal based solely on lack of jurisdiction is without prejudice.
3. The court and Clerk's Office could not calculate the petitioner's First Step Act credits because they lacked the necessary information; the Bureau of Prisons must perform the initial calculation.

KEY QUOTATIONS

“The Court agrees with Judge Bullard’s conclusion that, as a result, Mr. Sierra-Serrano has raised only a speculative risk of harm, which is insufficient for this Court to have jurisdiction over his Petition.”

“Unfortunately, neither the Court nor the Clerk’s Office can do so. Neither has the information required to make such a calculation, and it is the Bureau of Prison’s job to do so in the first instance.”

FACTUAL BACKGROUND

Sierra-Serrano alleged that the Bureau of Prisons was miscalculating his good-conduct time, First Step Act time credits, and Second Chance Act credits, affecting his Conditional Transition to Community date. He sought declarations establishing the maximum credits he could earn and a specific transition date of July 2, 2026. The court determined that his eligibility and credit total depended on future events that might not occur and that any transfer to prerelease custody would be discretionary with the Bureau of Prisons.

PROCEDURAL HISTORY

Sierra-Serrano filed a Petition for a Writ of Habeas Corpus on May 29, 2025. Magistrate Judge Elsa M. Bullard issued a Report and Recommendation recommending denial, and petitioner did not object. The district court found no clear error, adopted the Report and Recommendation, denied the petition, and dismissed the case without prejudice.

DISPOSITION

dismissed

CASES CITED

- Nur v. Olmsted County, 563 F. Supp. 3d 946, 949 (D. Minn. 2021)
- Grinder v. Gammon, 73 F.3d 793, 795 (8th Cir. 1996) (per curiam)
- TransUnion LLC v. Ramirez, 594 U.S. 413, 438 (2021)
- County of Mille Lacs v. Benjamin, 361 F.3d 460, 464-65 (8th Cir. 2004)
- Associated Elec. Co-op., Inc. v. Mid-Am. Transp. Co., 931 F.2d 1266, 1273 (8th Cir. 1991)

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