

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA, ERIE DIVISION

Omar S. Folk v. Warden McKean A. Newman

Folk · No. 1:24-CV-213-RAL · Decided January 13, 2026

SUMMARY

The court denied Omar S. Folk’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that challenges to prison educational programming, security classification, and prison conditions do not concern the fact or duration of confinement and therefore are not cognizable under § 2241. The court also concluded that Loper Bright Enterprises v. Raimondo did not alter that result and noted that Folk’s claims concerning FCI McKean were moot after his transfer.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania, Erie Division
WRITING FOR THE COURT	Richard A. Lanzillo
JURISDICTION	United States District Court for the Western District of Pennsylvania, Erie Division
DECIDED	January 13, 2026
DOCKET	1:24-CV-213-RAL
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241, challenging the denial of access to prison educational programming and seeking transfer to a lower-security institution. The court denied the petition.
STANDARD OF REVIEW	The court considered whether the petition fell within the court's habeas jurisdiction under 28 U.S.C. § 2241. It also considered mootness resulting from Petitioner's transfer to another institution.
PRECEDENTIAL VALUE	unpublished and nonprecedential
PARTIES	Omar S. Folk v. Warden McKean A. Newman

TOPICS

- federal habeas corpus
- post-conviction relief
- administrative law
- judicial review of agency action
- statutory interpretation

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Administrative law

Prisoner litigation

QUESTIONS PRESENTED

1. Whether a federal prisoner's challenge to denial of educational programming and a resulting security classification, which does not affect the fact or duration of confinement, is cognizable under 28 U.S.C. § 2241.
2. Whether *Loper Bright Enterprises v. Raimondo* makes the petition cognizable or otherwise changes the analysis of the Bureau of Prisons' implementation of the sentence.
3. Whether Petitioner's transfer from FCI McKean rendered his claims concerning lockdowns at that institution moot.

HOLDINGS

1. A federal prisoner's challenge to denial of prison educational programming and to a resulting security classification is not cognizable under § 2241 when it does not challenge the fact or duration of confinement.
2. *Loper Bright Enterprises v. Raimondo* does not make Folk's § 2241 claims cognizable because *Loper Bright* concerns judicial deference to agency interpretations of statutes challenged under the Administrative Procedure Act, not the habeas claims presented here.
3. Petitioner's transfer from FCI McKean to FCI Hazelton rendered moot his claims concerning lockdowns and conditions at FCI McKean.

KEY QUOTATIONS

“The ‘core’ habeas corpus action is a prisoner challenging the authority of the entity detaining him to do so, usually on the ground that his predicate sentence or conviction is improper or invalid.” (Analysis)

“Courts have widely held that challenges to prison security classifications are not cognizable under § 2241 because such challenges do not implicate the fact or duration of imprisonment.” (Analysis)

“Courts must exercise their independent judgment in deciding whether an agency has acted within its statutory authority.” (Analysis)

FACTUAL BACKGROUND

Folk was a federal prisoner initially confined at FCI McKean and later transferred to FCI Hazelton. He alleged that early lockdowns at FCI McKean prevented him from participating in FSA and ACE educational courses, which he claimed impaired his ability to obtain a lower security classification. He sought an order requiring the warden to reopen access to the programming and also made general allegations that FCI McKean was overcrowded and unsanitary.

PROCEDURAL HISTORY

Folk filed a § 2241 petition while confined at FCI McKean in the Western District of Pennsylvania. While the action was pending, he was transferred to FCI Hazelton. The matter was fully briefed, and the court denied the petition, concluding that the claims were outside the core of habeas jurisdiction and, alternatively, that the claims concerning FCI McKean were moot after the transfer.

DISPOSITION

writ_denied

CASES CITED

- McGee v. Martinez, 627 F.3d 933, 935 (3d Cir.)
- Alward v. Warden, LSCI-Allenwood, 2024 WL 4112662, at *2 (M.D. Pa. Sept. 6, 2024)
- Preiser v. Rodriguez, 411 U.S. 475, 494 (1973)
- Okereke v. United States, 307 F.3d 117, 120 (3d Cir.)
- Cardona v. Bledsoe, 681 F.3d 533, 535-36 (3d Cir. 2012)
- Briley v. Warden Fort Dix FCI, 703 Fed. Appx. 69, 71 (3d Cir.)
- Cohen v. Lappin, 402 Fed. Appx. 674, 676 (3d Cir.)
- Lee v. Williamson, 297 Fed. Appx. 147, 148 (3d Cir.)
- Podhorn v. Grondolsky, 350 Fed. Appx. 618, 620 (3d Cir.)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369, 412 (2024)
- Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc., 467 U.S. 837 (1984)
- Folk v. Sage, 2024 WL 5379816, at *1 n. 1 (M.D. Pa. Aug. 7, 2024)
- Folk v. Warden McKean FCI, 2025 WL 384108 (3d Cir. Feb. 4, 2025)
- Folk v. Park, 2025 WL 3764053, at *2 (3d Cir. Dec. 30, 2025)
- Eiland v. Warden, Fort Dix FCI, 634 Fed. Appx. 87, 89 (3d Cir.)
- Griffin v. Beard, 401 Fed. Appx. 715, 716 (3d Cir.)
- Williams v. McKean, 2019 WL 1118057, at *5 n. 6 (W.D. Pa. Mar. 11, 2019)
- United States v. Cepero, 224 F.3d 256, 264-65 (3d Cir. 2000)
- Gonzalez v. Thaler, 565 U.S. 134 (2012)

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