

## Inside Out — Week of April 27, 2026: Three In-Custody Deaths, Estill Reopens, Sentencing Commission Adopts Amendments

This week's briefing covers a cluster of in-custody deaths at three separate federal facilities, the Bureau of Prisons' (BOP) reopening of FCI Estill in South Carolina, the U.S. Sentencing Commission's adoption of proposed amendments to the federal sentencing guidelines at its April 16 meeting, and continuing scrutiny of the BOP's administrative remedy process. The briefing also tracks a national resource team deployment to FCC Coleman in Florida and reviews recent federal court activity on guilty-plea withdrawals, supervised release, and § 922(g)(1) firearm prohibitions.

Because several items touch on overlapping procedures — administrative remedies (the grievance process under 28 C.F.R. §§ 542.10–.19), compassionate release under 18 U.S.C. § 3582(c)(1)(A), and First Step Act (FSA) Earned Time Credits — the deep dives explain each procedure in plain English before walking through what the week's developments change in practice.

Readers will find a deep dive on custody deaths and notification rights, a deep dive on the Sentencing Commission's April amendment package, a systemic-issues section on the administrative remedy process and on facility operations at FCC Coleman, quick hits on BOP operations and reentry, and a practical tip on documenting FSA credit disputes.

### THIS WEEK'S LEAD

## Three In-Custody Deaths Reported at MCC San Diego, FCI Oakdale 1, and FCI Milan

*Theme: deaths / custody / family notification*

The BOP issued press releases this month reporting deaths of individuals in custody at three federal facilities: the Metropolitan Correctional Center (MCC) San Diego, a pretrial detention facility in California; the Federal Correctional Institution (FCI) Oakdale 1, a low-security prison in Louisiana; and FCI Milan, a low-security prison in Michigan. BOP press releases for in-custody deaths typically state the person's name, the date of death, the facility, and note that the FBI and local authorities have been notified. They generally do not state a cause of death at release.

For families, the gap between a BOP press release and a complete factual account can stretch for months. Cause of death is determined by a medical examiner, not the BOP, and the agency's internal after-action process — including any Office of Inspector General (OIG) review — runs on its own timeline. Families are often the last to receive detailed information, and the formal channels for obtaining records (autopsy, medical file, incident reports) are not automatic.

Understanding the notification and records-request framework matters because the steps taken in the first days after a death — preserving legal claims, requesting records, identifying counsel — are often the steps that determine whether a family can later reconstruct what happened.

## UNDERSTANDING THIS STORY

### FAMILY, FRIENDS & ADVOCATES

#### **If you are the family of someone who died in federal custody**

The BOP's next-of-kin procedures are set out in Program Statement 5553.06 (Escapes/Deaths Notification) and related guidance. The warden or a designee is expected to notify the listed next of kin; if you are that person, ask the caller for their name, title, facility, and a callback number, and write down the time of the call. Ask whether the body has been released to a medical examiner and which one. The county medical examiner (not the BOP) performs the autopsy and issues the death certificate.

Request the decedent's complete BOP medical file and central file. Medical records can be requested by the personal representative of the estate under the Privacy Act (5 U.S.C. § 552a) and the Freedom of Information Act (FOIA, 5 U.S.C. § 552). Submit the request in writing to the BOP's FOIA/Privacy Act office, include a certified copy of the death certificate and documentation of your authority (e.g., letters testamentary), and keep copies of everything you send.

Consider contacting a civil rights or prisoners' rights attorney promptly. Claims against the federal government for wrongful death or medical neglect may fall under the Federal Tort Claims Act (FTCA, 28 U.S.C. §§ 1346(b), 2671–2680), which has a two-year statute of limitations running from the date the claim accrues and requires an administrative claim on Standard Form 95 before any lawsuit can be filed.

### DURING INCARCERATION

#### **If you are currently in custody and witnessed events before a death**

Write down what you saw, heard, and when, and keep that written account with your legal papers. Under BOP policy, inmate-to-inmate mail generally does not qualify as legally privileged, but correspondence with your own attorney marked as legal mail under Program Statement 5265.14 receives special-mail handling. If you wish to preserve an account for a family or a civil attorney, consider sending it as legal mail to a lawyer who has filed a visitation or representation form on your behalf.

If staff ask you to provide a statement, you may ask to have counsel present. Decisions about cooperating with internal investigations can have disciplinary and safety implications; where possible, consult the facility's attorney-of-record process or a family member who can retain counsel.

## ATTORNEYS & PRISON OFFICIALS

### If you are counsel to a decedent's family

Priority records to request include: the BOP medical file, central file, and any SENTRY notes; the local medical examiner's autopsy report and toxicology; any 911 or EMS records from the responding jurisdiction; and — through FOIA — after-action reviews, incident reports, and any Psychology Services contacts in the months before death. The OIG maintains a complaint intake at [oig.justice.gov](http://oig.justice.gov); filing a complaint preserves the option of an independent review and may generate records separately from the BOP's own files.

For FTCA claims, calendar the two-year administrative-claim deadline from the date of death (or later accrual) and file Standard Form 95 with the BOP. The agency has six months to respond; after that, or after a denial, the family may file suit in federal district court.

## POLICY & REGULATORY REFERENCES

BOP Program Statement 5553.06 governs notification of escape and death to next of kin and establishes the internal reporting chain within the agency. Medical and file records held by the BOP are accessible through FOIA (5 U.S.C. § 552) and the Privacy Act (5 U.S.C. § 552a); the agency's FOIA regulations appear at 28 C.F.R. Part 16. For civil claims, the Federal Tort Claims Act (28 U.S.C. §§ 1346(b), 2671–2680) requires exhaustion of an administrative claim (Standard Form 95) before suit and imposes a two-year limitations period under 28 U.S.C. § 2401(b). Independent oversight runs through the DOJ Office of Inspector General under the Inspector General Act of 1978, codified at 5 U.S.C. App. §§ 1–13. Reporting by LISA Newsletter (Legal Information Services Associates) has tracked multiple cases in which government filings relied on BOP-supplied medical summaries later contradicted by underlying records, underscoring the importance of obtaining primary records directly rather than relying on secondhand agency summaries.

## ACTION ITEMS THIS WEEK

- Record the date, time, caller name, title, facility, and callback number for every BOP notification call; keep a dated log.
- Identify the county medical examiner with jurisdiction over the facility and request the autopsy report and death certificate directly from that office.
- Submit a FOIA/Privacy Act request to the BOP for the decedent's complete medical and central file; include certified death certificate and proof of estate authority.
- File a complaint with the DOJ Office of Inspector General at [oig.justice.gov](http://oig.justice.gov) to preserve an independent review track.
- Calendar the two-year FTCA deadline from the date of death and consult counsel about filing Standard Form 95 with the BOP well before that date.
- Request any EMS, 911, and responding-agency records from the local jurisdiction — these are not held by the BOP and must be sought separately.

## SOURCES

Death at MCC San Diego — *Federal Bureau of Prisons*

DEEP DIVE 2

## U.S. Sentencing Commission Adopts April 2026 Amendment Package; Submission Cycle Begins

*Theme: sentencing commission / april amendments*

On April 16, 2026, the U.S. Sentencing Commission (USSC) — the independent agency that writes the federal sentencing guidelines — held its annual April meeting and voted to adopt proposed amendments for the current amendment cycle. Under the Sentencing Reform Act (28 U.S.C. § 994(p)), amendments adopted by the Commission are submitted to Congress by May 1 and, absent congressional disapproval, take effect November 1 of that year. This year's package includes adjustments to the methamphetamine purity guidelines, changes to the career-offender framework, and inflation adjustments to the fraud loss table used in § 2B1.1.

The amendments do not automatically apply retroactively. Retroactivity is a separate decision the Commission makes by listing an amendment in U.S.S.G. § 1B1.10(d). If an amendment is made retroactive, people already sentenced may seek a sentence reduction under 18 U.S.C. § 3582(c)(2). If it is not, the amendment applies only to sentencing that occur on or after its effective date.

The practical effect for readers depends heavily on the offense of conviction. Readers with methamphetamine cases, career-offender designations, or fraud-loss-driven guideline ranges should be tracking the final text, the effective date, and whether the Commission later designates any portion of the package as retroactive.

### UNDERSTANDING THIS STORY

#### BEFORE INCARCERATION

##### If you are pre-sentence

Discuss with counsel whether your sentencing date is likely to fall before or after November 1, 2026, and whether any portion of the adopted package would affect your guideline range. Courts may consider amendments that have been adopted but are not yet effective as a basis for a variance under 18 U.S.C. § 3553(a), though they are not required to do so. The adopted text of each amendment will be published on [ussc.gov](https://ussc.gov); the 'Reader-Friendly' version typically appears within days of the vote.

If your case involves methamphetamine, a career-offender enhancement, or a fraud-loss calculation, ask counsel to model both the current guideline range and the post-amendment range. That comparison is often the basis for a continuance request or for variance arguments at sentencing.

## DURING INCARCERATION

### If you are currently serving a sentence

Whether you can benefit depends on two things: (1) whether any amendment in the April 2026 package is later designated retroactive by the Commission, and (2) whether your current guideline range would actually be lower under the amended text. The Commission typically votes on retroactivity separately from adoption, often months later, after studying how many cases would be affected.

If the Commission makes an amendment retroactive, the procedural vehicle is a motion under 18 U.S.C. § 3582(c)(2), filed in the sentencing court. Most districts use a form process; the federal defender's office in the sentencing district is usually the first point of contact and in many districts is appointed automatically to screen eligible cases. Do not file prematurely — courts routinely deny § 3582(c)(2) motions filed before an amendment is made retroactive.

## ATTORNEYS & PRISON OFFICIALS

### For counsel tracking the amendment cycle

Key dates: submission to Congress by May 1, 2026; congressional review period of 180 days; presumptive effective date of November 1, 2026. The Commission's reasoned basis for each amendment appears in the 'Reason for Amendment' section and is often cited by courts considering variance requests. The JD Supra and Reuters coverage of the white-collar and fraud-inflation changes provides a useful practitioner overview; the Law360 report on the Supreme Court's grant of certiorari in a guidelines-commentary case signals that the authority of guideline commentary — distinct from the guidelines themselves — remains unsettled.

## POLICY & REGULATORY REFERENCES

The Sentencing Commission's authority and procedures are set out in 28 U.S.C. §§ 991–998, with amendment submission governed by § 994(p). Retroactivity determinations are made under U.S.S.G. § 1B1.10, and sentence reductions based on retroactive amendments are brought under 18 U.S.C. § 3582(c)(2). Variance arguments at original sentencing rest on 18 U.S.C. § 3553(a). The fraud guidelines at U.S.S.G. § 2B1.1 use a loss table whose dollar thresholds are the subject of this year's inflation adjustment; career-offender provisions are at § 4B1.1. LISA Newsletter (Legal Information Services Associates) has published analysis of the April 14 pre-meeting posture and the April 20 post-meeting result, which readers may consult for a walkthrough of what the Commission adopted versus what it deferred. A pending Supreme Court case on the weight courts give to guideline commentary — separately reported by Law360 — may further shape how the amended guidelines are applied.

### ACTION ITEMS THIS WEEK

- Bookmark [ussc.gov](http://ussc.gov) and download the Reader-Friendly version of the April 2026 amendments when posted.
- If pre-sentence, ask counsel to compute your guideline range under both the current and amended text and to decide whether to seek a continuance until November 1, 2026.
- If currently serving, do not file a § 3582(c)(2) motion until the Commission votes on retroactivity; instead, request that the federal defender in your sentencing district flag your case for review.
- For fraud cases, confirm whether the inflation adjustment to § 2B1.1 would move your loss amount into a lower offense-level tier.
- For career-offender cases, ask counsel whether the adopted changes alter the definition of 'crime of violence' or 'controlled substance offense' as applied to your predicates.
- Track the Commission's calendar for its retroactivity vote, which typically occurs separately and may be months after adoption.

### SOURCES

Sentencing Commission to Adopt Proposed Amendments On Thursday — Update for April 14, 2026 — *LISA Newsletter (Legal Information Services Associates)*

Sentencing Commission Builds Us Up, Disappoints Again — Update for April 20, 2026 — *LISA Newsletter (Legal Information Services Associates)*

U.S. Sentencing Commission Adopts Amendments to Simplify Federal Sentencing Guidelines — *Davis Vanguard*

US sentencing panel adjusts fraud punishment guidelines for inflation — *Reuters*

Proposed Changes to Federal Sentencing Guidelines and Their Potential Effect on White Collar Cases — *JD Supra*  
Justices Take Up Sentencing Guidelines Commentary Dispute — *Law360*

## Systemic Issues Inside Out Is Watching

*Patterns the publication is tracking this week from source material and court filings. Each entry includes factual description of the pattern and concrete guidance for readers affected by it.*

# Administrative Remedy Process: Delays and Documentation

## PATTERN

The BOP's administrative remedy program — the internal grievance system required before most lawsuits about prison conditions — is codified at 28 C.F.R. §§ 542.10–.19 and implemented through Program Statement 1330.18. It proceeds in tiers: an informal attempt (BP-8), a formal request to the warden (BP-9), a regional appeal (BP-10), and a national appeal to the General Counsel (BP-11). Each level has response deadlines (20 calendar days at BP-9, 30 at BP-10, 40 at BP-11, all extendable once). Forbes reported in April that practitioners and researchers continue to document response times that exceed those deadlines, along with missing or untracked filings.

Because the Prison Litigation Reform Act (42 U.S.C. § 1997e(a)) requires exhaustion of 'available' remedies before suit, delays and lost filings have concrete legal consequences: a remedy that is not actually available may be deemed exhausted, but only with proof.

## WHAT FAMILIES AND DEFENDANTS CAN DO

Document every step. Keep dated copies of every BP-8, BP-9, BP-10, and BP-11, including the tracking number on the counselor's or warden's stamp. If a deadline passes without response, the regulation at 28 C.F.R. § 542.18 permits the inmate to treat the non-response as a denial and proceed to the next level — note the date and move up. For families outside, request copies by mail through the inmate and keep a parallel file. If a remedy is rejected for a procedural defect, the rejection notice must state the defect; save it. When retaining counsel for a civil action, these records are often the difference between a case that survives a motion to dismiss and one that does not.

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## SOURCES

Bureau Of Prisons' Administrative Remedy Process Questioned — *Forbes*

Let's 'Beat' Inmate Abuse — Update for April 23, 2026 — *LISA Newsletter (Legal Information Services Associates)*

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# FCC Coleman: National Resource Team Deployment

## PATTERN

On April 14, 2026, the BOP announced the deployment of a National Resource Team to the Federal Correctional Complex (FCC) Coleman, a multi-security complex in central Florida that includes USP Coleman I, USP Coleman II, FCI Coleman Low, and FCI Coleman Medium. A National Resource Team deployment typically involves additional staff and administrative support sent temporarily to a facility identified as needing operational assistance. The BOP's announcement did not specify the particular operational concern.

## WHAT FAMILIES AND DEFENDANTS CAN DO

Families with a loved one at any Coleman facility should expect possible short-term disruptions to visiting, mail processing, programming, and phone access during and immediately after a resource team deployment. If visiting is your primary contact channel, call the facility's main number the day before travel to confirm visiting status. If programming affecting FSA Earned Time Credit accrual is interrupted, ask the unit team in writing whether credit will continue to accrue during the interruption under Program Statement 5410.01, and keep a copy of the response. If scheduled RDAP (Residential Drug Abuse Program) cohorts or UNICOR assignments are affected, document the interruption and dates for any future FSA or sentence-computation disputes.

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## SOURCES

BOP Deploys National Resource Team to FCC Coleman — *Federal Bureau of Prisons*

## BOP Operations

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### **BOP Celebrates the Restoration of FCI Estill**

*Federal Bureau of Prisons · 2026-04-15*

FCI Estill, a low-security federal prison in South Carolina that was temporarily closed in 2023 following infrastructure issues, has resumed operations. For defendants awaiting designation who score low-security under PATTERN (the BOP's risk-assessment tool used to assign custody level and recidivism risk), Estill's return widens the pool of potential placements in the Southeast region — a factor worth raising with counsel when submitting placement preferences to the Designation and Sentence Computation Center (DSCC) in Grand Prairie, Texas.

### **Year One: Progress, Pressure, and Purpose (Transparency Talks podcast)**

*Federal Bureau of Prisons · 2026-04-16*

The BOP published a new episode of its Transparency Talks podcast reviewing the past year's operational priorities. For families tracking agency direction, the podcast is one of the few channels in which BOP leadership discusses staffing, infrastructure, and program implementation on the record; it can be useful background when preparing questions for a unit team meeting or a case manager.

### **Honoring Victims, Strengthening Justice**

*Federal Bureau of Prisons · 2026-04-22*

The BOP published a National Crime Victims' Rights Week item describing victim-notification activities. Victims and survivors can register with the DOJ's Victim Notification System (VNS) at [notify.usdoj.gov](https://notify.usdoj.gov) to receive automated updates on custody status, transfers, and release; registration survives transfers between facilities.

### **Second Chance Month Spotlight**

*Federal Bureau of Prisons · 2026-04-13*

The agency highlighted reentry programming tied to Second Chance Month. Readers approaching release should confirm with their unit team the status of Residential Reentry Center (RRC, or 'halfway house') and home-confinement placement under 18 U.S.C. § 3624(c) and the FSA pre-release custody provisions at 18 U.S.C. § 3624(g).

## Sentencing & Courts

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### **Guilty-Plea Withdrawal Requires Hearing Where Facts Are in Dispute**

*LISA Newsletter (Legal Information Services Associates) · 2026-04-24*

LISA summarizes recent federal appellate analysis of Federal Rule of Criminal Procedure 11(d), which governs withdrawal of guilty pleas after acceptance but before sentencing. Where a defendant asserts that counsel's representations were materially inaccurate and the facts are disputed, courts are expected to conduct an evidentiary hearing rather than resolve the motion on competing affidavits. Defendants considering plea withdrawal should consult counsel promptly; the standard tightens significantly once sentence is imposed.

## Supreme Court Has Not Resolved § 922(g)(1) Constitutionality

*LISA Newsletter (Legal Information Services Associates) · 2026-04-16*

LISA reports that the Supreme Court denied certiorari last month in roughly a dozen petitions challenging 18 U.S.C. § 922(g)(1), the federal statute prohibiting firearm possession by those with a qualifying felony conviction. Circuits remain split on the statute's application under the framework in *N.Y. State Rifle & Pistol Ass'n v. Bruen*. Defendants with pending § 922(g)(1) charges or convictions should preserve Second Amendment challenges at every stage; the circuit in which the case arises currently controls the outcome.

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## Supervised Release Revocation and Conditions

*LISA Newsletter (Legal Information Services Associates) · 2026-04-13*

LISA reviews recent decisions on the scope of supervised release conditions (18 U.S.C. § 3583) and the procedures for revocation. Readers on supervision or approaching release should obtain a copy of their judgment and commitment order, confirm the exact written conditions, and raise any vague or overbroad conditions with counsel — objections are often procedurally easier to raise early than after an alleged violation.

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## DOJ Case Dismissals and Charging Patterns

*LISA Newsletter (Legal Information Services Associates) · 2026-04-10*

LISA analyzes reported shifts in DOJ charging and dismissal patterns. The practical effect for current defendants is that charging decisions vary by district and over time; counsel in plea negotiations can sometimes point to comparable declined or dismissed cases in the district as a basis for resolution.

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## Policy & Legislation

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### FY2027 BOP Budget Proposal

*LISA Newsletter (Legal Information Services Associates) · 2026-04-17*

LISA reports that the administration's Fiscal Year 2027 budget request proposes a \$1.7 billion increase to the BOP's current \$8.1 billion budget. Budget levels influence staffing, programming capacity, and facility maintenance — each of which in turn affects FSA programming availability, RRC placement timing, and medical-care staffing. Final figures depend on congressional appropriations.

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### Safer Prisons Act of 2026 (S. 4305) Introduced

*LISA Newsletter (Legal Information Services Associates) · 2026-04-23*

Senator Marsha Blackburn (R-TN) introduced S. 4305, which would increase criminal penalties for inmates convicted of assaulting BOP correctional officers. The bill has been introduced but not enacted; readers tracking its progress can follow the bill page at [congress.gov](https://www.congress.gov).

## **Federal Prisoner Sentenced for Assault at FMC Springfield**

*KY3 · 2026-04-23*

A federal prisoner was sentenced for assaulting a nurse at the U.S. Medical Center for Federal Prisoners (FMC Springfield), Missouri — a BOP medical-referral facility. Assaults on federal staff are prosecuted under 18 U.S.C. § 111 and typically carry a consecutive sentence; the case illustrates how in-custody conduct can extend a prison term and can affect FSA eligibility under 18 U.S.C. § 3632(d)(4)(D).

## **Reentry & Designation**

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### **Abby Lee Miller Released to Halfway House**

*ABC News · 2026-04-24*

The reporting notes a transfer from BOP custody to a Residential Reentry Center (RRC). RRC placement — commonly called 'halfway house' — operates under 18 U.S.C. § 3624(c) and, for eligible individuals, the FSA pre-release custody provisions at § 3624(g). Placement length is determined by a combination of unit-team referral, the Residential Reentry Management (RRM) office, and bed availability in the receiving district.

### **Michael Avenatti Moves to Halfway House**

*New York Post · 2026-04-17*

Another high-profile RRC transfer. For families planning for a loved one's reentry, the practical sequence is: unit team initiates referral, RRM office reviews, and the receiving RRC confirms a bed date. Delays commonly arise when approved housing at the RRC is not available; confirming that the RRC has the person's intake packet well before the target date can help avoid last-minute problems.

**PRACTICAL TIP**

## **Practical tip this week: build a paper trail for FSA Earned Time Credit disputes**

First Step Act Earned Time Credits (FSA ETCs) reduce time in custody for eligible individuals who complete Evidence-Based Recidivism Reduction (EBRR) programs and Productive Activities, under 18 U.S.C. § 3632(d)(4) and BOP Program Statement 5410.01. Disputes about whether credits were earned, applied, or forfeited are among the most common issues families raise. The single most useful step is documentation. Ask the unit team for a current copy of the inmate's FSA Time Credit Assessment and Individualized Needs Assessment; both are maintained in SENTRY and can be printed on request.

If a credit appears missing, raise it first with the case manager in writing, then escalate through the administrative remedy process (BP-8 through BP-11) under 28 C.F.R. §§ 542.10–.19. Keep every tracking number, every response, and every date. If the timelines in § 542.18 lapse without response, note the date — the regulation permits treating non-response as a denial and proceeding to the next level. A clean paper record is what turns an internal frustration into a reviewable claim.

*Inside Out is a service publication of DrPrison.org, reporting on the federal prison system for families, defendants, attorneys, and advocates. Readers who need further assistance navigating a specific federal-prison matter can reach DrPrison.org at [help@drprison.org](mailto:help@drprison.org). Next issue: May 4, 2026.*

### **NEED FURTHER ASSISTANCE?**

Readers navigating a specific federal-prison matter — a designation question, a halfway house issue, an administrative remedy, a compassionate release motion — can reach DrPrison.org directly at [help@drprison.org](mailto:help@drprison.org). Inside Out is a free service; no subscription required.

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