

SECOND CHANCE 4 R.E.A.L.™

SEPTEMBER 2026 LEGAL WELLNESS NEWSLETTER

THE DOOR IS NOT CLOSED

Recent Compassionate Release and § 2255 Victories Show Why Every Case Deserves a Careful Review

Educate. Organize. Empower.

For people serving federal sentences—and for the families supporting them—the last several months have brought some difficult legal developments.

On May 28, 2026, the United States Supreme Court decided *Rutherford v. United States*. The Court held that when Congress makes a sentencing change nonretroactive, the resulting sentencing disparity cannot, by itself, serve as the “extraordinary and compelling” reason necessary for compassionate release under 18 U.S.C. § 3582(c)(1)(A).

For some people, that decision sounded like another door had been closed.

But that is not the entire story.

Since *Rutherford*, federal courts have continued to grant compassionate release when defendants presented different extraordinary and compelling circumstances supported by strong evidence.

And in July 2026, another federal court granted relief under **28 U.S.C. § 2255** and reduced a 25-year sentence to **time served**.

The lesson is not that everyone qualifies.

The lesson is:

Do not assume there is no hope until the individual facts, sentencing history, current law, procedural history, rehabilitation, medical circumstances, family circumstances, and available records have been carefully reviewed.

COMPASSIONATE RELEASE AFTER *RUTHERFORD*

United States v. Juan Carlos Espinal

Criminal Action No. 21-cr-10298-PBS

United States District Court for the District of Massachusetts

Decision: August 3, 2026

This is one of the most important recent compassionate-release decisions because it came **after the Supreme Court's decision in *Rutherford***.

Juan Carlos Espinal had pleaded guilty to conspiracy to distribute and possess with intent to distribute cocaine. In June 2024, he received a **70-month federal sentence**.

Espinal later sought compassionate release.

His argument was not simply that his sentence was too long.

It was not based on trying to overturn his conviction through compassionate release.

And it was not based solely on a later change in sentencing law.

Instead, Espinal presented a serious **family-caregiver circumstance**.

What happened?

Espinal and his wife have twin adult sons with cerebral palsy and significant disabilities. According to the court's findings, their needs had become extremely demanding. One required especially extensive physical care.

While Espinal was incarcerated, the burden of caring for the sons fell primarily on his wife.

The available assistance decreased.

Family members who had previously helped were no longer realistically available.

His wife's physical and mental condition deteriorated.

The court found that the children's needs had significantly surpassed what she could reasonably manage alone.

The court specifically considered the Supreme Court's new *Rutherford* standard and concluded that Espinal's circumstances were sufficiently unusual and convincing to constitute an extraordinary and compelling reason for relief.

The court also considered other important factors.

Espinal had no prior criminal history. His underlying offense was serious, but the government did not contend that he was violent. The court considered his parenting history, rehabilitation programs, institutional employment, conduct, family circumstances, public-safety concerns, and the sentencing factors under 18 U.S.C. § 3553(a).

THE RESULT

The court **GRANTED compassionate release.**

Espinal's prison sentence was reduced to:

TIME SERVED

He was ordered to serve three years of supervised release, with the first year subject to home confinement and electronic monitoring.

WHY *ESPINAL* MATTERS

The Supreme Court narrowed one route to compassionate release in *Rutherford*.

But *Espinal* demonstrates something important:

Compassionate release itself is not dead.

The focus has become even more individualized.

The question is not simply:

“Has the law changed?”

It may also be:

What has changed in this person's life?

What medical circumstances exist?

What family emergency exists?

Who is caring for a disabled child, spouse, parent, or other dependent?

What has the individual accomplished while incarcerated?

What does the disciplinary history show?

What does the rehabilitation record show?

How much of the sentence has been served?

What release plan exists?

What does the person intend to do if released?

And most importantly:

Can these circumstances be documented?

Hope is important.

Documentation turns hope into something a court can actually evaluate.

ANOTHER COMPASSIONATE-RELEASE VICTORY

United States v. Jared Stottlar

Criminal No. 20-cr-061-LM

Opinion No. 2026 DNH 068 P

United States District Court for the District of New Hampshire

Decision: June 2, 2026

Jared Stottlar's case provides another important lesson.

He had already asked for compassionate release once.

His first motion was denied.

The court denied that motion without prejudice in February 2025. At that time, the court was already deeply concerned about the adequacy of Stottlar's medical care and recognized his significant rehabilitation.

But the judge also considered the seriousness of his offenses and the amount of the sentence he had served.

So relief was denied.

That was not the end of the story.

Stottlar later returned with a **renewed motion**.

His medical situation and the record concerning his treatment had continued developing.

The court documented a history that included colon cancer, continuing medical complications, treatment and communication problems inside the Bureau of Prisons, persistent physical problems, and additional unresolved medical issues.

But there was another major part of the case:

Rehabilitation.

The court described Stottlar's rehabilitation in extraordinary terms.

His record included extensive substance-abuse programming, educational programming, mentorship of other incarcerated people, work assisting prisoners suffering from memory disorders, service with a comfort-care program for dying prisoners, and participation in suicide-watch support.

The court found his rehabilitation genuine and unusually strong.

Importantly, the court also discussed *Rutherford* and explained that *Rutherford's* prohibition concerning nonretroactive sentencing changes was **not implicated** by Stottlar's claim.

The court ultimately concluded that the combination of Stottlar's complicated medical circumstances and profound rehabilitation constituted extraordinary and compelling reasons for a reduction.

The court also noted that he had served approximately 60% of his sentence after accounting for good-time credits, had essentially no prior criminal history, was classified by BOP at the lowest recidivism-risk level, and had strong family and community support.

THE RESULT

On June 2, 2026, Stottlar's renewed motion for compassionate release was:

GRANTED

His sentence was reduced to:

TIME SERVED

followed by the four-year term of supervised release previously imposed.

SECOND CHANCE 4 R.E.A.L. LEGAL WELLNESS LESSON

Stottlar's first motion was denied.

His later motion was granted.

That does **not** mean someone should simply keep filing the same motion over and over.

A repeated motion without a legitimate legal or factual basis may go nowhere.

But Stottlar demonstrates why a prior denial should be carefully reviewed.

Ask:

Why was the first motion denied?

Have the circumstances materially changed?

Is there new medical evidence?

Has substantially more of the sentence now been served?

Has rehabilitation continued?

Are there new family circumstances?

Has controlling law changed?

Were important documents missing from the earlier presentation?

A denial tells you what happened **then**.

It does not necessarily answer every question about what may exist **now**.

COULD ONE OF THESE LEGAL ISSUES APPLY TO YOU OR SOMEONE YOU LOVE?

Every federal case is different.

One person's victory does not establish another person's eligibility.

But if you or a loved one is serving a federal sentence, some questions may be worth examining.

A review might include:

- Whether serious medical or family circumstances have changed since sentencing.
- Whether a compassionate-release request was previously denied and why.
- Whether rehabilitation and institutional history have materially developed.
- Whether the Bureau of Prisons is providing necessary medical treatment.
- Whether unusual caregiver circumstances exist.
- Whether prior convictions used to enhance a sentence remain qualifying convictions under current law.
- Whether constitutional, ineffective-assistance, sentencing, jurisdictional or other § 2255 issues may exist.
- Whether procedural default, waiver, the one-year limitation period, or the restrictions on second or successive petitions create barriers.
- Whether important court records, transcripts, plea documents, sentencing materials or prior motions need to be obtained and reviewed.
- Whether there is a realistic reentry and release plan.

THE FIRST QUESTION DOES NOT HAVE TO BE:

“Can you guarantee I will win?”

Nobody can responsibly guarantee that.

A better first question may be:

“Has my case been carefully reviewed under the law and circumstances that exist today?”

SECOND CHANCE 4 R.E.A.L.™ CAN HELP YOU GET ORGANIZED

Second Chance 4 R.E.A.L. can assist individuals and families with legal education, court-record organization, case and sentencing timelines, document review, research support, rehabilitation and reentry organization, questions for counsel, and proposed draft materials for qualified review.

Through **Paralegal Pal™**, our Legal Wellness AI assistant, users can also receive help understanding complicated terminology, organizing case information, identifying missing documents, preparing questions, and becoming better informed before making important decisions.

Do not give up simply because the law is difficult.

Get educated.

Get organized.

Find out what the record actually says.

Determine what has changed.

Then decide on the next informed step.

SECOND CHANCE 4 R.E.A.L.™

Educate. Organize. Empower.

For information about our legal-education, document-support and case-organization services:

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