

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-2818

UNITED STATES OF AMERICA

v.

THOMAS TRAUMANN,
Appellant

On Appeal from the United States District Court
for the Eastern District of Pennsylvania
(D.C. Criminal Action No. 2:18-cr-00564-001)
District Judge: Honorable John F. Murphy

Submitted on Appellee's Motion for Summary Action
Pursuant to Third Circuit LAR 27.4 and I.O.P. 10.6
August 13, 2026
Before: KRAUSE, MATEY, and BOVE, *Circuit Judges*

(Opinion filed: September 14, 2026)

OPINION*

PER CURIAM

* This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

Appellant Thomas Traumann, proceeding pro se, appeals the District Court’s order denying reconsideration of his motion for compassionate release. The Government has moved for summary action and for leave to be excused from filing a brief. For the following reasons, we will summarily affirm the District Court’s judgment.

In October 2020, Traumann pleaded guilty to one count of interstate travel with the intent to engage in illicit sexual conduct with a minor. 18 U.S.C. § 2423(b). He was sentenced to 99 months in prison and 10 years of supervised release. *See United States v. Traumann*, 2023 WL 2142660, at *1 (E.D. Pa. Feb. 21, 2023). As part of his plea, he waived his rights to appeal or collaterally attack his conviction, with limited exceptions. *See id.* However, Traumann has since filed numerous post-conviction motions.

As relevant here, in 2022 he filed an “Omnibus Motion” arguing, among other things, that his indictment and guilty plea were invalid because Congress amended § 2423(b) shortly after he was indicted—changing the statute’s language from travel “for the purpose of” engaging in illicit sexual conduct to travel “with a motivating purpose of” doing so, *see* Abolish Human Trafficking Act of 2017, Pub. L. No. 115-392, § 14, 132 Stat. 5250, 5256 (2018)—and that neither the Government nor the District Court informed him of the change to the statute. The District Court denied the motion, enforcing the waiver and explaining that Traumann’s claims were nevertheless meritless. *See Traumann*, 2023 WL 2142660, at *1. This Court summarily affirmed the District Court’s judgment. *See United States v. Traumann*, No. 23-1770, 2023 WL 7211395, at *1 (3d Cir. July 25, 2023).

In 2023, Traumann filed a motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A), based on his medical conditions and the same statutory amendment argument. The District Court denied that motion, and Traumann appealed. We vacated and remanded for further consideration of the medical claim, as the District Court’s order did not explain its reasoning on that issue. *See United States v. Traumann*, No. 23-2985, 2024 WL 4357746, at *2 (3d Cir. Oct. 1, 2024). However, we rejected Traumann’s statutory-amendment argument.¹ *See id.* at *3 (citing *Okereke v. United States*, 307 F.3d 117, 120 (3d Cir. 2002)).

In his filings on remand, Traumann largely focused on raising the statutory-amendment argument instead of his medical conditions. Consistent with our mandate, however, the District Court addressed Traumann’s medical claim in detail and denied compassionate release on that ground, noting that his arguments concerning the validity of his plea were unrelated to his health conditions and were not properly brought in a motion for compassionate release. Traumann moved for reconsideration, which the District Court denied. He timely appealed.

¹ Traumann’s claim lacks merit because the amended version of § 2423(b) “is facially broader than the version to which [he] pleaded guilty” and “appears to have codified the longstanding interpretation of the prior version that the Government need not prove that the defendant’s sole purpose in traveling was to engage in sexual activity.” *Traumann*, 2024 WL 4357746, at *3 (citing *United States v. Hayward*, 359 F.3d 631, 638 (3d Cir. 2004)).

We have jurisdiction under 28 U.S.C. § 1291. We review the District Court’s orders for abuse of discretion. *See United States v. Pawlowski*, 967 F.3d 327, 330 (3d Cir. 2020) (denials of compassionate-release motions); *United States v. Kalb*, 891 F.3d 455, 459 (3d Cir. 2018) (denials of reconsideration motions). We may summarily affirm the District Court’s decision if the appeal fails to present a substantial question. *See* 3d Cir. L.A.R. 27.4; 3d Cir. I.O.P. 10.6.

“Challenges close to the core of habeas corpus must be brought, if at all, under the specific federal habeas corpus statute—[such as § 2255]—which was explicitly and historically designed to provide the means for a [federal] prisoner to attack the validity of his confinement.” *Fernandez v. United States*, 608 U.S. ----, 146 S. Ct. 1292, 1301 (2026) (citation modified). This is true for Traumann’s statutory-amendment challenge to the validity of his indictment and guilty plea, *see Velazquez v. Superintendent Fayette SCI*, 937 F.3d 151, 158 (3d Cir. 2019) (“Challenges to the validity of a guilty plea are among those that make up the traditional scope of habeas corpus.” (citation modified)), as evidenced by his requested relief of a judgment of acquittal. *See* C.A. Doc. 10 at 50; *Fernandez*, 146 S. Ct. at 1305 (explaining that, when “a prisoner ‘attack[s] the validity of his confinement’ and ‘seeks either immediate release from that confinement or the shortening of its duration,’ his claim belongs under the umbrella of” habeas, not compassionate release). Moreover, even putting Traumann’s waiver of his appellate rights aside, he already raised the same argument in his “Omnibus Motion,” and it has been rejected as meritless by both the District Court and this Court. Thus, the District

Court did not abuse its discretion in determining that the statutory amendment argument is not a basis for compassionate release,² and denying Traumann's motion for reconsideration.

Accordingly, we grant the Government's motion for leave to be excused from filing a brief and will summarily affirm the District Court's judgment.³

² Traumann argues that the District Court wrongly adjudicated his constitutional challenges to his conviction as part of the compassionate-release case when they actually belonged on a "separate and distinct path[] for relief." C.A. Doc. 10 at 9. But the proper vehicle for a constitutional challenge is a § 2255 motion and, presumably to avoid the attendant gatekeeping provisions, *see generally Fernandez*, 146 S. Ct. at 1300, Traumann did not file such a motion. Under the circumstances, it was reasonable for the District Court to address the constitutional challenges as part of the ongoing compassionate-release proceedings.

³ Though Traumann does not meaningfully challenge the District Court's determination that his medical conditions did not amount to extraordinary and compelling reasons for compassionate release, we agree with the District Court for the reasons stated in its opinion. We note that his additional arguments are unpersuasive; his assertion that the Government and District Court intentionally concealed the amendment to § 2423(b) is not supported by the record.