

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 26-1011

UNITED STATES OF AMERICA

v.

JOSE GABRIEL SANTANA-ROBLES,
Appellant

On Appeal from the U.S. District Court, M.D. Pa.
Judge Malachy E. Mannion, No. 3:23-cr-00262-001

Before: HARDIMAN, BIBAS, AND RENDELL, *Circuit Judges*
Submitted: Sept. 18, 2026; Filed: Sept. 23, 2026

OPINION OF THE COURT

RENDELL, *Circuit Judge*. Appellant Jose Santana-Robles challenges the denial of his motion for termination of supervised release. Because the District Court was without authority to grant his motion, we will affirm.

I. FACTS & PROCEDURAL HISTORY

Appellant was charged in the District of Puerto Rico with possessing firearms and drugs. He pled guilty to possessing a firearm in furtherance of drug-trafficking crimes

and possessing marijuana with intent to distribute. The District Court sentenced him to 60 months of imprisonment and 60 months of supervised release.

In July 2022, he began his term of supervised release, which was later transferred to the Middle District of Pennsylvania. He accumulated violations, including for testing positive for marijuana and leaving the jurisdiction without permission. In February 2024, the District Court issued a warrant for arrest for his violations. Over a year later, he was arrested in Oregon and was transported to Pennsylvania.

During his revocation hearing, he pled guilty to Grade C supervised release violations. His counsel acknowledged that Appellant needed rehabilitation, but noted that he had moved to Oregon to be with his girlfriend and had established a stable life with her and worked as a barber. The District Court then sentenced Appellant to four months of imprisonment, followed by 24 months of supervised release.

After Appellant served his prison term, his Probation Officer attempted to transfer supervision to the District of Oregon, which did not accept the transfer. In November 2025, Appellant commenced his term of supervision. In December 2025, Appellant moved to terminate supervised release. The District Court denied the motion, noting that it denied the motion “for the reasons previously placed on the record at his Supervised Release violation sentencing.” App. 1.

II. JURISDICTION & STANDARD OF REVIEW

We have jurisdiction under 28 U.S.C. § 1291. *See United States v. Melvin*, 978 F.3d 49, 52 (3d Cir. 2020). We review a district court’s denial of a motion for early termination of supervised release for abuse of discretion. *See United States v. Sheppard*, 17 F.4th 449, 454 (3d Cir. 2021). “An abuse of discretion ‘can occur if [a district court] fails to apply the proper legal standard[.]’” *Melvin*, 978 F.3d at 52 (quoting *United States v. Tomko*, 562 F.3d 558, 565 (3d Cir. 2009) (en banc)). “We may affirm a district court for any reason supported by the record.” *Brightwell v. Lehman*, 637 F.3d 187, 191 (3d Cir. 2011).

III. ANALYSIS

On appeal, Appellant argues that the District Court abused its discretion in denying his motion to terminate supervised release. In response, the Government argues that the District Court did not have authority to grant relief because Appellant’s motion was premature under 18 U.S.C. § 3583(e)(1). We agree with the Government.

Section 3583(e)(1) contemplates the termination of a term of supervised release only after a defendant has served one year of supervised release. 18 U.S.C. § 3583(e) (“The court may . . . terminate a term of supervised release and discharge the defendant released at any time after the expiration of one

year of supervised release[.]”). Appellant and the Government disagree as to when that one-year clock begins. The Government contends it begins with each term of supervised release, while Appellant argues it just requires the defendant to have previously served one year of supervised release, regardless of revocation or the imposition of a new term.

Our job is to interpret the words consistent with their “ordinary meaning . . . at the time Congress enacted the statute.” *Perrin v. United States*, 444 U.S. 37, 42 (1979). Looking at the contemporaneous dictionary definitions when the statute was enacted, “term” refers to “[a] portion of time having definite limits; a period, *esp.* a set or appointed period; the space of time through which something lasts or is intended to last; duration, length of time.” *Term*, *Oxford English Dictionary* (2nd ed. 1989), <https://www.oed.com/oedv2/00249353>; *see also Term*, *Black’s Law Dictionary* (6th ed. 1990) (“Period of determined or prescribed duration. A specified period of time; e.g. term of lease, loan, contract, court session, public office, sentence.”). The word “term” can be modified, *e.g.*, with modifiers like “first,” “last,” “new,” “old,” or “two-year.” But the word’s meaning itself is not inherently changed, it is simply specified. Accordingly, as originally understood, “term” referred to the set period of supervised release imposed by the court.

As “[s]tatutory language cannot be construed in a vacuum,” we turn next to the context. *Weyerhaeuser Co. v. U.S. Fish & Wildlife Serv.*, 586 U.S. 9, 20 (2018) (alteration in

original) (citation omitted). Reading the provision in full, the common sense reading of § 3583(e)(1) suggests that “supervised release” refers to the same “term of supervised release” that is the subject of the motion for termination permitted by the provision. Accordingly, the “term of supervised release” sought to be terminated is subject to the requirement that the motion must be made after “the expiration of one year of supervised release.” Put simply, a defendant must have served a year of the term of supervised release that he seeks to terminate.

Looking at the broader structure of the statute, § 3583 details the permitted term of supervised release, along with revocation and early termination or modification. The Supreme Court recently explained that the Sentencing Reform Act instructs that “a term of supervised release starts ‘the day the person is released from imprisonment,’” and it must end before it exceeds its maximum length, depending on the severity of the defendant’s underlying offense. *Rico v. United States*, 146 S. Ct. 947, 953 (2026) (holding that the Sentencing Reform Act does not authorize a rule automatically extending a term of supervised release when the defendant absconds). The Court then addressed absconders of supervised release, like Appellant, noting that “[s]hould a defendant violate those . . . conditions, a court may (and sometimes must) revoke his supervised release and send him back to prison with *a new term* of supervised release to follow.” *Id.* (citing. §§ 3583(e)(3), (g)) (emphasis added). The Government also identifies case law in which we, and our sister circuits, utilize similar language to

distinguish the terms of supervised release between the pre-revocation or original term, and the post-revocation term. *See, e.g., United States v. Clark*, 726 F.3d 496, 501 (3d Cir. 2013) (“If the court revokes supervised release and sentences the defendant to a new term of imprisonment, it may include a *new term* of supervised release as well.” (emphasis added)); *United States v. Wing*, 682 F.3d 861, 872 (9th Cir. 2012) (“Under the statutory scheme Congress has chosen, once a term of supervised release is revoked, *that term ends*, and any term of supervised release commencing after imprisonment . . . is a *new and separate term*.” (emphasis added)). This language also supports a reading of the statute that requires one year of the term of supervised release that the defendant seeks to terminate. And while it is true that supervised release, including the possibility of revocation, constitutes part of the original *sentence*, there are still separate terms of *supervised release*. *See United States v. Smalls*, 155 F.4th 216, 222–23 (3d Cir. 2025). As we have explained, a term of supervised release imposed upon revocation is a new and separate term of supervised release for purposes of § 3583(e)(1).

Looking at the purpose of § 3583 generally further reinforces that conclusion. “The congressional policy in providing for a term of supervised release after incarceration is to improve the odds of a successful transition from the prison to liberty.” *Johnson v. United States*, 529 U.S. 694, 708–09 (2000). “The Senate Report was quite explicit about this, stating that the goal of supervised release is ‘to ease the defendant’s transition into the community after the service of a

long prison term for a particularly serious offense, or to provide rehabilitation to a defendant who has spent a fairly short period in prison for punishment or other purposes but still needs supervision and training programs after release.” *Id.* at 709 (quoting S.Rep. No. 98–225, p. 124 (1983)). The plain reading of a one-year requirement of the term of supervised release before that term is eligible for termination thus comports with the purpose in providing rehabilitation and easing the defendant’s transition from imprisonment.

The statutory history further supports this reading. Section 3583(h) was added in 1994 and permits a district court to include a term of supervised release following a revocation-imprisonment term. *See* 18 U.S.C. § 3583(h) (“When a term of supervised release is revoked and the defendant is required to serve a term of imprisonment, the court may include a requirement that the defendant be placed on a term of supervised release after imprisonment.”). The addition of this provision reinforces that the post-revocation term of supervised release is meant to function as a new supervisory period, and thus contains its own one-year requirement before termination under Subsection (e)(1) is available.

In sum, the text, purpose, and history all support the common sense reading that the one-year clock starts from the beginning of the *current* term of supervised release that a defendant may seek to terminate. Because Appellant filed his motion less than two months into his term of supervised release, his request was foreclosed by Section 3583(e)(1) and

the District Court did not have the authority to grant his request.

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Accordingly, we will AFFIRM the District Court's order denying Appellant's motion for termination of supervised release.

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