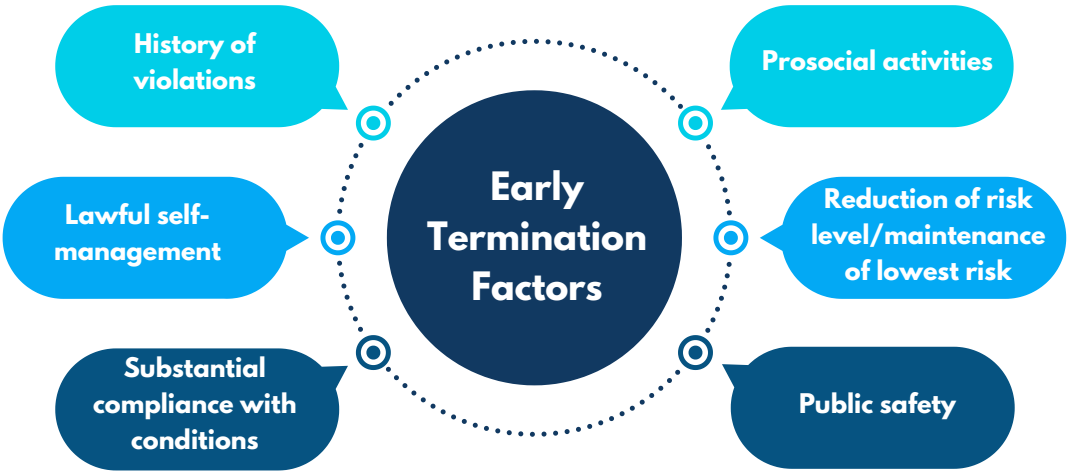
Early Termination of Supervised Release

18 U.S.C. § 3583(e)(1) and USSG §5D1.4(b), App. Note 1(B)

This document serves as a quick reference to the federal statute permitting the termination of supervised release after one year and the corresponding guideline reference.

Section 5D1.4
App. Note 1(B)

When determining whether to terminate the remaining term of supervised release, the court may wish to consider such factors as:



18 U.S.C. § 3583(e)(1)



A sufficient time has passed | One Year

The Court can consider termination even with a mandatory minimum term of supervised release.

"[S]ection 841(b)(1) does not impact a district court's ability under § 3583(e)(1) to later terminate an individual's supervised release after the individual has served at least one year."

United States v. Lester, 92 F.4th 740 (8th Cir. 2024)

United States v. Collins, 171 F.4th 830 (6th Cir, 2026)



The Court reviews the applicable 3553(a) factors, except 3553(a)(2)(A) and (a)(3).

The court may decline to terminate supervised release early, but explain the reason for the denial.

The district court abused its discretion by "failing to consider the statutory [§ 3553(a)] factors" as required under § 3583(e)(1). "Simply stating the court has reviewed the motion is not enough."

United States v. Lowe - 632 F.3d 996 (7th Cir. 2011)



It is warranted by the conduct of the defendant and the interests of justice.

The defendant does not need to show "exceptional circumstances."

It's important to know that early termination does not require an "an exceptional, extraordinary, new, or unforeseen circumstance."

United States v. Melvin - 978 F.3d 49 (3d Cir. 2020)

United States v. Ponce, 22 F.4th 1045 (9th Cir. 2022)

United States v. Hale, 127 F.4th 638 (6th Cir. 2025)

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