

United States Court of Appeals
For the Eighth Circuit

No. 25-2958

United States of America

Plaintiff - Appellee

v.

Brian Darnell Brown

Defendant - Appellant

Appeal from United States District Court
for the Eastern District of Arkansas - Central

Submitted: April 30, 2026

Filed: May 5, 2026

[Unpublished]

Before LOKEN, SMITH, and BENTON, Circuit Judges.

PER CURIAM.

Brian Brown appeals after the district court¹ revoked his supervised release and sentenced him to 10 months in prison and 2 years of supervised release. On appeal,

¹The Honorable Brian S. Miller, United States District Judge for the Eastern District of Arkansas.

Brown contends that the district court committed a procedural error and imposed a substantively unreasonable revocation sentence.

Having carefully reviewed the record and the parties' arguments on appeal, we conclude that no significant procedural error occurred, and Brown's revocation sentence was not substantively unreasonable. See United States v. Tumea, 103 F.4th 1349, 1352 (8th Cir. 2024) (procedural errors include selecting sentence based on clearly erroneous facts; unobjected-to procedural sentencing error is reviewed under plain error standard); United States v. O'Connor, 567 F.3d 395, 397 (8th Cir. 2009) (substantive reasonableness is reviewed under deferential abuse-of-discretion standard; sentence may be unreasonable if district court fails to consider relevant factor, gives significant weight to improper factor, or commits clear error of judgment); see also United States v. Beckwith, 57 F.4th 630, 632 (8th Cir. 2023) (per curiam) (revocation sentence within Guidelines range is accorded presumption of substantive reasonableness on appeal).

Accordingly, we affirm.
