

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
NORTH CAROLINA

James Curtin v. Chuck Watts, et al.

Curtin · No. 1:25CV782 · Decided May 20, 2026

SUMMARY

The United States District Court for the Middle District of North Carolina granted motions to dismiss claims brought by pro se plaintiff James Curtin against Chuck Watts, Watts Law PLC, Cyberlux Corporation, and HII Mission Technologies Corporation. The court held that the cited federal statutes and regulations did not provide Curtin with a private right of action, and that the complaint failed to plausibly state claims under Virginia law for tortious interference, civil conspiracy, breach of fiduciary duty, or negligent supervision. The court dismissed some claims with prejudice, dismissed the tortious-interference and civil-conspiracy claims without prejudice, and warned Curtin that future filings containing fabricated legal authority could result in Rule 11 sanctions.

CASE DETAILS

COURT	United States District Court for the Middle District of North Carolina
WRITING FOR THE COURT	Thomas D. Schroeder
JURISDICTION	United States District Court for the Middle District of North Carolina
DECIDED	May 20, 2026
DOCKET	1:25CV782
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants HII Mission Technologies Corporation, Chuck Watts, Watts Law PLC, and Cyberlux Corporation moved to dismiss the amended complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court granted the motions and dismissed the action in part with prejudice and in part without prejudice.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, draws reasonable inferences in the plaintiff's favor, disregards legal conclusions and conclusory statements, and determines whether the complaint states a facially plausible claim for relief. Documents attached to the complaint may be considered without converting the motion to one for summary judgment. The court also considered whether the pleaded federal statutes created private rights of action.

PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	James Curtin v. Chuck Watts, Watts Law PLC, Cyberlux Corporation, HII Mission Technologies Corporation

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QUESTIONS PRESENTED

1. Whether the federal criminal statutes, federal contracting statutes, and FAR, DFARS, and ITAR provisions invoked by Curtin created a private right of action.
2. Whether Curtin plausibly pleaded tortious interference with business expectancy under Virginia law.
3. Whether Curtin plausibly pleaded civil conspiracy under Virginia law.
4. Whether Curtin alleged a fiduciary duty owed specifically to him and a breach of that duty.
5. Whether Virginia recognizes an independent cause of action for negligent supervision.
6. Whether Curtin's fabricated or materially misrepresented legal quotations warranted sanctions under Federal Rule of Civil Procedure 11.

HOLDINGS

1. The federal statutes and regulations cited by Curtin did not provide him with a private right of action for the pleaded claims. The Computer Fraud and Abuse Act contains a limited civil cause of action, but Curtin did not plead a qualifying violation or loss; the whistleblower retaliation provision in 41 U.S.C. § 4712 did not apply because he did not allege that he was an employee covered by the statute. The federal criminal statutes and contracting regulations could not support his private claims.
2. Curtin failed to plausibly state a Virginia claim for tortious interference with business expectancy because the complaint used collective and conclusory allegations and did not allege specific facts showing actionable intentional interference by any defendant.
3. Curtin failed to plausibly state a civil conspiracy claim because he did not allege sufficient facts showing that any defendant committed a wrongful or tortious act in furtherance of the alleged conspiracy.
4. Curtin failed to state a breach of fiduciary duty claim under Virginia law because he did not allege that any defendant owed a fiduciary duty to him specifically.
5. Virginia does not recognize an independent cause of action for negligent supervision, so Curtin's negligent-supervision claim was dismissed.

6. Curtin was warned that future filings containing fabricated legal authority may result in sanctions under Federal Rule of Civil Procedure 11.

KEY QUOTATIONS

“Language in a regulation may invoke a private right of action that Congress through statutory text created, but it may not create a right that Congress has not.” (Section II.A)

“All litigants, whether pro se or represented, are bound by the Federal Rules of Civil Procedure.” (Section II.C)

“Courts across the country have issued sanctions against attorneys and pro se parties for submitting fictitious case citations, fictitious quotations, and related misrepresentations to the court.” (Section II.C)

FACTUAL BACKGROUND

Curtin owned and operated a Virginia consulting and technology-development company and published articles under the name Jackson Holt. After Cyberlux executives approached him regarding potential business relationships, Curtin alleged that he discovered and publicized regulatory and financial problems involving Cyberlux and the misuse of foreign military financing funds. He later alleged that he was photographed, doxxed, harassed, and subjected to communications involving one of his clients, causing business partners to withdraw from negotiations. The complaint attributed most alleged conduct collectively to the defendants and specifically identified only a communication by Cyberlux officer Bill Maadarani with one of Curtin's clients.

PROCEDURAL HISTORY

Curtin filed an amended complaint asserting tortious interference with business expectancy, civil conspiracy, breach of fiduciary duty or misuse of public office, and negligent supervision claims arising from alleged misconduct involving federal defense contracts and alleged retaliation. The defendants moved to dismiss. The district court held that the asserted federal statutes and regulations did not provide Curtin with a private right of action, that the state-law claims were inadequately pleaded or not cognizable under Virginia law, and that the complaint should be dismissed.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Ibarra v. United States, 120 F.3d 472, 474 (4th Cir. 1997)
- Langford v. Joyner, 62 F.4th 122, 126 (4th Cir. 2023)
- Grable & Sons Metal Products, Inc. v. Darue Engineering & Mfg., 545 U.S. 308, 317 (2005)

- Alexander v. Sandoval, 532 U.S. 275, 291 (2001)
- State of Ga. v. Pennsylvania R. Co., 324 U.S. 439, 447 (1945)
- Francis v. Allstate Ins. Co., 709 F.3d 362, 369 (4th Cir. 2013)
- SciGrip, Inc. v. Osae, 838 S.E.2d 334, 343 (N.C. 2020)
- Harco Nat'l Ins. Co. v. Grant Thornton LLP, 698 S.E.2d 719, 724 (N.C. Ct. App. 2010)
- Dunlap v. Cottman Transmission Systems, LLC, 754 S.E.2d 313, 318 (Va. 2014)
- McCleary-Evans v. Md. Dep't of Transp., 780 F.3d 582, 585 (4th Cir. 2015)
- Simmons v. Miller, 544 S.E.2d 666, 676-77 (Va. 2001)
- L-3 Commc'ns Corp. v. Serco, Inc., 926 F.3d 85, 92 (4th Cir. 2019)
- Gelber v. Glock, 800 S.E.2d 800, 821 (Va. 2017)
- Schlegel v. Bank of America, N.A., 505 F. Supp. 2d 321, 326 (W.D. Va. 2007)
- Carstensen v. Chrisland Corp., 442 S.E.2d 660, 666-67 (Va. 1994)
- Elrod v. Busch Entertainment Corp., Nos. 4:09cv164, 4:09cv165, 4:09cv166, 2010 WL 5620918, at *6 (E.D. Va. Dec. 14, 2010), report and recommendation adopted, 2011 WL 166636 (E.D. Va. Jan. 19, 2011)
- Sinochem International Co. Ltd. v. Malaysia International Shipping Corp., 549 U.S. 422, 430 (2007)
- Goldlawr, Inc. v. Heiman, 369 U.S. 463, 466 (1962)
- Christianson v. Colt Industries Operating Corp., 486 U.S. 800, 817 (1988)
- Arizona v. California, 460 U.S. 605, 618 n.8 (1983)
- McNeil v. United States, 508 U.S. 106, 113 (1993)
- Hansan v. Fairfax Cty. Sch. Bd., 405 F. App'x 793, 794 (4th Cir. 2010) (per curiam)
- Ferris v. Amazon.com Services, LLC, 778 F. Supp. 3d 879, 881-82 (N.D. Miss. 2025)
- United States v. Hayes, 763 F. Supp. 3d 1054, 1071 (E.D. Cal. 2025)
- Allen v. Western Governors University, No. 2:25-cv-00325-RFB-NJK, 2026 WL 893368, at *1 (D. Nev. Mar. 31, 2026)

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