

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Johnnie L. Raley v. Jonathan Pitts, et al.

Raley · No. 2:24-cv-340-RAH · Decided December 1, 2025

SUMMARY

The United States District Court for the Middle District of Alabama partially adopted and partially rejected a magistrate judge’s recommendation concerning Johnnie L. Raley’s amended complaint. The court dismissed Counts Two and Three but allowed a limited Fourth Amendment false or wrongful arrest claim under Count One to proceed against three defendants based on alleged pre-arrest demands for physical identification.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	December 1, 2025
DOCKET	2:24-cv-340-RAH
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a Magistrate Judge's recommendation to dismiss the amended complaint after the plaintiff filed no objection. Applying clear-error review, the court adopted the recommendation in part, rejected it insofar as it recommended dismissal of Count One in its entirety, dismissed Counts Two and Three, and referred the remaining portion of Count One for further proceedings.
STANDARD OF REVIEW	Clear-error review because no timely objection was filed to the Magistrate Judge's recommendation.
PRECEDENTIAL VALUE	Unknown; unpublished district court order
PARTIES	Johnnie L. Raley v. Jonathan Pitts, Clay Conway, Mike Cheshire, et al.

TOPICS

- motions to dismiss
- section 1983
- police misconduct
- civil rights
- constitutional law

PRACTICE AREAS

Civil rights

Civil procedure

Constitutional law

QUESTIONS PRESENTED

1. Whether the Magistrate Judge's recommendation should be accepted under clear-error review when the plaintiff filed no objection.
2. Whether Count One sufficiently stated a Fourth Amendment false or wrongful arrest claim based on the alleged pre-arrest demands for a driver's license or other physical identification.
3. Whether Counts Two and Three and the remaining portions of Count One should be dismissed for failure to state a claim.

HOLDINGS

1. Count One sufficiently states a Fourth Amendment false or wrongful arrest claim against Jonathan Pitts, Clay Conway, and Mike Cheshire, but only insofar as the claim is based on their alleged pre-arrest demands that Raley produce a driver's license or other form of physical identification.
2. Counts Two and Three are dismissed, and any portion of Count One asserting a claim other than the narrowly defined claim based on the alleged pre-arrest demands for physical identification is dismissed.

KEY QUOTATIONS

"In the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation."

"Count One sufficiently states a Fourth Amendment false/wrongful arrest claim"

FACTUAL BACKGROUND

Raley alleged that Defendants Jonathan Pitts, Clay Conway, and Mike Cheshire made a pre-arrest demand that he produce a driver's license or other physical identification. The court treated those allegations as potentially supporting a Fourth Amendment false or wrongful arrest claim. The amended complaint also asserted other claims under the First and Fourth Amendments and state law, but the court found those claims insufficient or otherwise subject to dismissal.

PROCEDURAL HISTORY

The Magistrate Judge recommended dismissal of the amended complaint for failure to state claims under 42 U.S.C. § 1983 and failure to sufficiently plead state-law claims. Raley did not object, so the district court reviewed the recommendation for clear error. The district court concluded that a narrowly defined portion of Count One sufficiently stated a Fourth Amendment false or wrongful arrest claim, while dismissing all other claims and portions of Count One.

DISPOSITION

other

REMAND INSTRUCTIONS

The case is referred back to the Magistrate Judge for further proceedings limited to Count One against Jonathan Pitts, Clay Conway, and Mike Cheshire, based solely on the alleged pre-arrest demands that Raley produce a driver's license or other physical identification.

CASES CITED

- Macort v. Prem, Inc., 208 F. App'x 781, 784 (11th Cir. 2006) (per curiam)
- Edger v. McCabe, 84 F.4th 1230, 1231-34 (11th Cir. 2023)
- Jennings v. Smith, No. 23-14171, 2024 WL 4315127 (11th Cir. Sept. 27, 2024)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION JOHNNIE L. RALEY,)) Plaintiff,)) v.) Case No. 2:24-cv-340-RAH)
JONATHAN PITTS, et al.,)) Defendants.) ORDER On October 29, 2025, the Magistrate Judge recommended that Raley's Amended Complaint be dismissed in its entirety because it fails to state § 1983 claims for false arrest under the First and Fourth Amendments and fails to sufficiently raise any state-law claims.

Raley did not file an objection, and therefore this Court considers the Recommendation for clear error. See Macort v. Prem, Inc., 208 F. App'x 781, 784 (11th Cir. 2006) (per curiam) (citations omitted) ("Most circuits agree that '[i]n the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.'").

Upon an independent review of the file and upon consideration of the Recommendation of the Magistrate Judge, this Court concludes that Count One sufficiently states a Fourth Amendment false/wrongful arrest claim (see doc. 17 at 12) against Defendants Jonathan Pitts, Clay Conway and Mike Cheshire as tied to the Defendants' alleged pre-arrest demand that Raley produce a drivers license or other form of physical identification.

See, e.g., Edger v. McCabe, 84 F.4th 1230, 1231-34 (11th Cir. 2023) (finding that "officers did not have probable cause to make arrest for obstructing a governmental function" based on plaintiffs failure to follow officer's commands to produce physical identification); Jennings v. Smith, No. 23- 14171, 2024 WL 4315127 (11th Cir. Sept. 27, 2024).

In all other respects, the Recommendation will be adopted. Accordingly, it is ORDERED as follows: 1. For the reasons stated, the Recommendation (Doc. 11) is ADOPTED in part and

REJECTED in part, in that the Recommendation is rejected to the sole and limited extent that it recommends dismissal of Count One in its entirety.

In all other respects, the Recommendation is ADOPTED; 2. Counts Two and Three are DISMISSED; 3. This case is REFERRED back to the Magistrate Judge for further proceedings limited to Count One against Defendants Jonathan Pitts, Clay Conway and Mike Cheshire as tied to these Defendants' alleged pre-arrest demands that Raley produce a drivers license or other form of physical identification.

To the extent Count One attempts to state any other claim, Count One is DISMISSED. DONE on this the 1st day of December 2025. UNITED STATES DISTRICT JUDGE