

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA

Pedro Anaya v. Miami Dade Corrections and Rehabilitation
Department Headquarters

Anaya · No. 26-CV-20345-ELFENBEIN · Decided March 12, 2026

SUMMARY

The document is a Report and Recommendation recommending dismissal without prejudice of Pedro Anaya’s pro se civil action against the Miami-Dade Corrections and Rehabilitation Department Headquarters. The court concluded that the plaintiff had not established federal subject-matter jurisdiction because diversity jurisdiction was inadequately alleged and a federal-question basis was not clearly asserted, and the plaintiff failed to respond to an order to show cause.

CASE DETAILS

COURT	United States District Court for the Southern District of Florida
WRITING FOR THE COURT	Marty Fuleguiera Elfenbein
JURISDICTION	United States District Court for the Southern District of Florida
DECIDED	March 12, 2026
DOCKET	26-CV-20345-ELFENBEIN
DISPOSITION	dismissed
PROCEDURAL POSTURE	Report and recommendation on sua sponte review recommending dismissal without prejudice for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The Court independently examined subject-matter jurisdiction sua sponte and applied the rule that the party invoking federal jurisdiction bears the burden of establishing jurisdiction by a preponderance of the evidence.
PRECEDENTIAL VALUE	Nonprecedential report and recommendation; subject to district-judge review and possible objections.

TOPICS

- subject matter jurisdiction
- civil procedure
- pleadings
- fourteenth amendment
- section 1983

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the Court could exercise diversity jurisdiction under 28 U.S.C. § 1332 when the complaint did not establish complete diversity or an amount in controversy exceeding \$75,000.
2. Whether the Court could exercise federal-question jurisdiction under 28 U.S.C. § 1331 when the complaint mentioned constitutional violations but did not expressly invoke federal-question jurisdiction, identify a federal cause of action, or provide supporting factual allegations.
3. Whether dismissal without prejudice was appropriate when Plaintiff failed to establish subject-matter jurisdiction after being ordered to show cause.

HOLDINGS

1. Plaintiff failed to establish diversity jurisdiction because the complaint did not show complete diversity between Plaintiff and Defendant and did not establish that the amount in controversy exceeded \$75,000.
2. Plaintiff failed to establish federal-question jurisdiction because, although the complaint appeared to reference constitutional violations, it did not expressly invoke § 1331, identify a federal cause of action such as § 1983, or allege supporting facts sufficient to assure the Court that federal jurisdiction existed.
3. A federal court must examine its subject-matter jurisdiction sua sponte when jurisdiction may be lacking, including at the earliest possible stage of the proceedings.

KEY QUOTATIONS

“Because “[f]ederal courts are courts of limited jurisdiction,” they “possess only that power authorized by Constitution and statute, which is not to be expanded by judicial decree.”” (at 2)

“Diversity jurisdiction requires complete diversity; every plaintiff must be diverse from every defendant.” (at 2)

“[I]f a Complaint’s factual allegations do not assure the court it has subject matter jurisdiction, then the court is without power to do anything in the case.” (at 4)

FACTUAL BACKGROUND

Plaintiff alleged that correctional officers violated his constitutional rights by housing felons and misdemeanants together, improperly searching him, and releasing him from lockup in an unsafe location. He alleged that he was a California citizen but also identified a Miami-Dade County residence and Miami address. He did not state a dollar amount for his requested compensation, did not clearly plead federal-question jurisdiction or a federal cause of action, and failed to respond to the order to show cause.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint on January 20, 2026, alleging constitutional violations by a Miami-Dade governmental entity and invoking diversity jurisdiction. After questioning subject-matter jurisdiction, the Court issued an order to show cause requiring Plaintiff to identify a jurisdictional basis. Plaintiff failed to respond, and

the magistrate judge recommended dismissal without prejudice and closure of the case, subject to objections and review by the assigned district judge.

DISPOSITION

dismissed

CASES CITED

- Tannenbaum v. United States, 148 F.3d 1262, 1263 (11th Cir. 1998)
- Bank of New York Mellon v. Bazile, No. 24-CV-60328, 2024 WL 5433074, at *1 (S.D. Fla. May 30, 2024)
- Woldeab v. DeKalb County Board of Education, 885 F.3d 1289, 1292 (11th Cir. 2018)
- Travaglio v. American Express Co., 735 F.3d 1266, 1268 (11th Cir. 2013)
- Orchid Quay, LLC v. Suncor Bristol Bay, LLC, 178 F. Supp. 3d 1300, 1303 (S.D. Fla.)
- Triggs v. John Crump Toyota, Inc., 154 F.3d 1284, 1287 (11th Cir. 1998)
- Underwriters at Lloyd's, London v. Osting-Schwinn, 613 F.3d 1079, 1085 (11th Cir. 2010)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- University of South Alabama v. American Tobacco Co., 168 F.3d 405, 410 (11th Cir. 1999)
- Ruhrgas AG v. Marathon Oil Co., 526 U.S. 574, 583 (1999)
- Rolling Greens MHP, L.P. v. Comcast SCH Holdings LLC, 374 F.3d 1020, 1021-22 (11th Cir. 2004)
- Pacheco, 139 F.3d at 1373
- Thomas v. Arn, 474 U.S. 140, 149 (1985)
- Henley v. Johnson, 885 F.2d 790, 794 (11th Cir. 1989)