

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

L.M. v. Jonathan Graham

L.M. · No. 25-1213 · Decided February 27, 2026

SUMMARY

The United States Court of Appeals for the Fourth Circuit affirmed dismissal of L.M.'s 42 U.S.C. § 1983 malicious prosecution claims against Detective Jonathan Graham. The court held that the complaint did not plausibly allege that L.M.'s juvenile detention was unsupported by probable cause, because the investigation included eyewitness accounts and other corroborating information. The court also held that L.M. failed to adequately allege that Graham caused the seizure, given the independent probable-cause determination by the juvenile intake officer.

CASE DETAILS

COURT	United States Court of Appeals for the Fourth Circuit
WRITING FOR THE COURT	Judge Gregory; Judge Wilkinson; Judge King
JURISDICTION	United States Court of Appeals for the Fourth Circuit
DECIDED	February 27, 2026
DOCKET	25-1213
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the dismissal with prejudice under Federal Rule of Civil Procedure 12(b)(6) of a 42 U.S.C. § 1983 malicious-prosecution complaint against a police detective.
STANDARD OF REVIEW	De novo review of a dismissal for failure to state a claim under Rule 12(b)(6). Well-pleaded allegations are accepted as true, but the complaint must state a claim for relief that is plausible on its face. At the Rule 12(b)(6) stage, the court may consider public records, documents central to the plaintiff's claim, and documents sufficiently referred to in the complaint when their authenticity is undisputed.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	L.M., a minor, by his next friends and parents, Jane Roe #1 and John Doe #1, M.G., a minor, by his next friends and parents, Jane Roe #2 and John Doe #2, E.R., a minor, by his next friends and parents, Jane Roe #3 and John Doe #3 v. Jonathan Graham, Detective, Leesburg Police Department, in his individual and official capacities

TOPICS

section 1983 civil rights motions to dismiss standard of review appellate procedure

PRACTICE AREAS

civil rights constitutional law civil procedure appellate procedure

QUESTIONS PRESENTED

1. Whether L.M. plausibly alleged that his seizure pursuant to the juvenile petition was unsupported by probable cause because Graham omitted allegedly exculpatory information.
2. Whether L.M. plausibly alleged that Graham caused his seizure when a Juvenile Intake Officer made the probable-cause determination.
3. Whether the district court properly dismissed the § 1983 and Virginia-law malicious-prosecution claims under Rule 12(b)(6).

HOLDINGS

1. The complaint did not plausibly allege that L.M.'s seizure lacked probable cause. Considering the totality of the circumstances, the witness identifications and supporting information established a fair probability that L.M. was one of the perpetrators, and the alleged omissions were not material enough to negate probable cause.
2. The complaint did not plausibly allege that Graham caused L.M.'s seizure. Although an independent probable-cause decision by a Juvenile Intake Officer does not automatically break the causal chain, L.M. alleged no facts showing that Graham withheld material information from or unduly influenced the Juvenile Intake Officer.
3. The district court properly dismissed L.M.'s federal and state malicious-prosecution claims against Graham for failure to state a claim.

KEY QUOTATIONS

“To succeed on a malicious prosecution claim under both Virginia law and the Fourth Amendment to the United States Constitution, the plaintiff “must allege that the defendant (1) caused (2) a seizure of the plaintiff pursuant to legal process unsupported by probable cause, and (3) criminal proceedings terminated in plaintiff’s favor.”” (7)

“For an omitted fact to be material, the omission must do more than potentially affect the probable cause determination: it must be necessary to the finding of probable cause.” (8)

“Without specific allegations that Graham withheld material facts from the Juvenile Intake Officer or unduly influenced the officer’s probable cause determination, L.M. did not allege that Graham caused L.M.’s seizure.” (12)

FACTUAL BACKGROUND

L.M., a juvenile, was detained after a juvenile petition charged him with aggravated sexual battery of an autistic middle-school student, based in part on an investigation by Detective Jonathan Graham. A witness, A.D., twice gave Graham detailed accounts identifying a boy known as “L” as one of the perpetrators, and the school identified L.M. as the student who had previously bullied A.D. Juvenile Intake determined that probable cause existed and issued a petition and detention order; the charges were later nolle prossed after Graham learned that A.D.’s statements to the prosecutor conflicted with statements made during the investigation.

PROCEDURAL HISTORY

L.M. and two other minors sued Graham and other defendants under 42 U.S.C. § 1983, alleging malicious prosecution in violation of Virginia law and the Fourth Amendment. The United States District Court for the Eastern District of Virginia dismissed Graham from the case with prejudice for failure to state a claim, concluding that L.M. had not adequately alleged lack of probable cause or causation. The Fourth Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- *Goines v. Valley Community Services Board*, 822 F.3d 159, 167 (4th Cir. 2016)
- *Withhohn v. Federal Insurance Co.*, 164 F. App’x 395, 396 (4th Cir. 2006)
- *Phillips v. LCI International, Inc.*, 190 F.3d 609, 618 (4th Cir. 1999)
- *Stephen Six v. Generations Federal Credit Union*, *Six v. Generations Federal Credit Union*, 891 F.3d 508, 512 (4th Cir. 2018)
- *Secretary of State for Defence v. Trimble Navigation Ltd.*, 484 F.3d 700, 705 (4th Cir. 2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Moretti v. Thorsdottir*, 157 F.4th 352, 359-60 (4th Cir. 2025)
- *Evans v. Chalmers*, 703 F.3d 636, 647-48, 651 (4th Cir. 2012)
- *O’Connor v. Tice*, 704 S.E.2d 572, 575 (Va. 2011)
- *Dill v. Kroger Limited Partnership I*, 300 Va. 99, 112 (2021)
- *Illinois v. Gates*, 462 U.S. 213, 230 (1983)
- *Graham v. Gagnon*, 831 F.3d 176, 184 (4th Cir. 2016)
- *Pritchett v. Alford*, 973 F.2d 307, 314 (4th Cir. 1992)
- *Smith v. Munday*, 848 F.3d 248, 254-55 (4th Cir. 2017)
- *Miller v. Prince George’s County*, 475 F.3d 621, 627 (4th Cir. 2007)
- *Kaley v. United States*, 571 U.S. 320, 338 (2014)
- *English v. Clarke*, 90 F.4th 636, 646 (4th Cir. 2024)
- *Torchinsky v. Siwinski*, 942 F.2d 257, 262 (4th Cir. 1991)
- *Wadkins v. Arnold*, 214 F.3d 535, 543 (4th Cir. 2000)

