

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Jerome Collins v. CPL Clancy, et al.

C.A. No. 25-588 (JLH) · No. C.A. No. 25-588 (JLH) · Decided December 10, 2025

SUMMARY

The United States District Court for the District of Delaware screened a pro se prisoner's 42 U.S.C. § 1983 complaint concerning alleged falsification of a police report and improper prosecution while state criminal charges were pending. The court dismissed the complaint without prejudice under the Younger abstention doctrine, denied as moot the motion for body-camera footage, and closed the case.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                  |
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| COURT                 | United States District Court for the District of Delaware                                                                                                                                                                                                                                                                        |
| WRITING FOR THE COURT | Jennifer L. Hall                                                                                                                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the District of Delaware                                                                                                                                                                                                                                                                        |
| DECIDED               | December 10, 2025                                                                                                                                                                                                                                                                                                                |
| DOCKET                | C.A. No. 25-588 (JLH)                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | A pro se pretrial detainee proceeding in forma pauperis filed a 42 U.S.C. § 1983 action seeking monetary relief and an injunction stopping his pending Delaware criminal prosecution. The court screened the complaint under 28 U.S.C. § 1915(e)(2)(B) and dismissed it without prejudice under the Younger abstention doctrine. |
| STANDARD OF REVIEW    | Sua sponte preliminary screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), requiring dismissal of an incarcerated or in forma pauperis plaintiff's complaint if it is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant.                                                      |
| PRECEDENTIAL VALUE    | Nonprecedential memorandum order                                                                                                                                                                                                                                                                                                 |

TOPICS

- section 1983
- injunctions
- civil rights
- federalism
- civil procedure

PRACTICE AREAS

- Civil rights
- Federal courts
- Criminal procedure
- Prisoner litigation

## QUESTIONS PRESENTED

1. Whether the court should abstain under *Younger* from exercising jurisdiction over Collins's request to enjoin an ongoing Delaware criminal prosecution.
2. Whether the complaint should be dismissed during statutory screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b).

## HOLDINGS

1. *Younger* abstention applies because Collins's state criminal proceeding is ongoing and judicial in nature, implicates important state interests, and provides an adequate opportunity to raise his federal concerns; therefore, the federal court must not interfere with the prosecution absent extraordinary circumstances.
2. The complaint must be dismissed without prejudice under the *Younger* abstention doctrine at the preliminary screening stage.

## KEY QUOTATIONS

*“There is “a strong federal policy against federal-court interference with pending state judicial proceedings absent extraordinary circumstances,”” (IV)*

*“Younger abstention is appropriate when “(1) there are ongoing state proceedings that are judicial in nature; (2) the state proceedings implicate important state interests; and (3) the state proceedings afford an adequate opportunity to raise federal claims.”” (IV)*

## FACTUAL BACKGROUND

Collins was in state pretrial detention on pending Delaware criminal charges. He alleged that a police officer falsified a report concerning a firearm near Collins's shoe and that a Delaware Deputy Attorney General knowingly allowed the case to proceed to a grand jury despite the alleged falsification. Collins sought monetary relief and requested that his criminal charges be dropped.

## PROCEDURAL HISTORY

Jerome Collins, detained before trial at the Sussex Correctional Institution, initiated this § 1983 action pro se and was granted leave to proceed in forma pauperis. After screening the complaint, the court concluded that the requested injunction would interfere with an ongoing state criminal proceeding and that Collins could raise his federal concerns in that proceeding. The complaint was dismissed without prejudice, his motion to obtain body-camera footage was denied as moot, and the case was closed.

## DISPOSITION

dismissed

## CASES CITED

- *Middlesex County Ethics Committee v. Garden State Bar Association*, 457 U.S. 423, 431 (1982)
- *Younger v. Harris*, 401 U.S. 37 (1971)

- Schall v. Joyce, 885 F.2d 101, 106 (3d Cir. 1989)

## OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE  
JEROME COLLINS, ) ) Plaintiff, ) ) v. ) C.A. No. 25-588 (JLH) ) CPL CLANCY, et al., ) )  
Defendants. ) MEMORANDUM ORDER I. Introduction Plaintiff Jerome Collins, who is in pre-trial detention at the Sussex Correctional Institution (SCI) in Georgetown, Delaware, initiated this civil action pro se and was granted leave to proceed in forma pauperis.

(D.I. 1, 5.) The Court reviews and screens the complaint (D.I. 3) under 28 U.S.C. § 1915(e)(2)(b).  
II. Background The complaint asserts claims under 42 U.S.C. § 1983. Plaintiff is in state pre-trial detention. (D.I. 3 at 1, 8, 10.) According to the complaint, a police officer involved in Plaintiff's arrest lied in a police report about the presence of a firearm near Plaintiff's shoe, and a Delaware Deputy Attorney General "allowed the case to go in front of a grand jury for indictment knowing that [the officer] falsified his report." (Id. at 5–7.)

In his complaint, Plaintiff requests monetary relief and that his "criminal charges [be] drop[ped]." (Id. at 8.) III. Legal Standard The Court shall dismiss a pro se complaint filed by an incarcerated plaintiff, or any plaintiff proceeding in forma pauperis, sua sponte upon a preliminary screening if the complaint is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from a defendant who is immune from such relief.

See 28 U.S.C. §§ 1915(e)(2)(B), 1915A(b). IV. Discussion There is "a strong federal policy against federal-court interference with pending state judicial proceedings absent extraordinary circumstances," *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, 431 (1982), referred to as the Younger abstention doctrine, see *Younger v. Harris*, 401 U.S. 37 (1971).

Younger abstention is appropriate when "(1) there are ongoing state proceedings that are judicial in nature; (2) the state proceedings implicate important state interests; and (3) the state proceedings afford an adequate opportunity to raise federal claims." *Schall v. Joyce*, 885 F.2d 101, 106 (3d Cir. 1989).

In this case, Plaintiff is awaiting trial on Delaware criminal charges. Plaintiff's request for an injunction to stop his state prosecution would plainly interfere with the state criminal proceeding. And Plaintiff can raise his concerns regarding the evidence against him and the legality of his prosecution in the state criminal proceeding.

V. Conclusion Based on the above, IT IS HEREBY ORDERED that the Complaint (D.I. 3) is DISMISSED without prejudice under the Younger doctrine. IT IS FURTHER ORDERED that Plaintiff's motion to obtain body camera footage (D.I. 8) is DENIED as moot. IT IS FINALLY ORDERED that the Clerk of Court is directed to CLOSE this case. United St istrict Judge

