

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Lorenzo Beaman v. State of New York, et al.

Beaman · No. 9:25-CV-1402 (ECC/MJK) · Decided January 22, 2026

SUMMARY

The United States District Court for the Northern District of New York dismissed Lorenzo Beaman’s pro se 42 U.S.C. § 1983 action arising from an alleged inmate assault at Greene Correctional Facility. The court held that the claims were untimely and barred by the Eleventh Amendment, and dismissed the action with prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Elizabeth C. Coombe
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	January 22, 2026
DOCKET	9:25-CV-1402 (ECC/MJK)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed an amended complaint after the court previously dismissed his Section 1983 claims without prejudice during screening. The district court sua sponte reviewed the amended complaint and dismissed the action with prejudice.
STANDARD OF REVIEW	The court conducted sua sponte review for frivolousness, subject matter jurisdiction, and sufficiency of the amended complaint, including review under 28 U.S.C. § 1915A(b).
PRECEDENTIAL VALUE	Unpublished district court decision; generally nonprecedential.

TOPICS

- section 1983
- prisoners rights
- eleventh amendment immunity
- statute of limitations
- subject matter jurisdiction

PRACTICE AREAS

- Civil rights
- Federal civil procedure
- Prisoner litigation
- Constitutional law

QUESTIONS PRESENTED

1. Whether the court could sua sponte dismiss a fee-paying pro se plaintiff's amended complaint as frivolous or for lack of subject matter jurisdiction.
2. Whether plaintiff's Section 1983 claims against the State of New York and Greene Correctional Facility were barred by the Eleventh Amendment.
3. Whether the Section 1983 claims, based on an alleged assault occurring on December 21, 2017, were untimely.
4. Whether plaintiff's supplemental submissions established any basis for tolling the limitations period or avoiding the Eleventh Amendment bar.

HOLDINGS

1. A district court may sua sponte dismiss a fee-paying pro se complaint when it is frivolous, presents no arguably meritorious issue, or cannot proceed because a dispositive jurisdictional or limitations defense is apparent from the pleading.
2. Plaintiff's Section 1983 claims against the State of New York and Greene Correctional Facility were barred by the Eleventh Amendment and could not proceed in federal court.
3. The Section 1983 claims were untimely because they were based on an alleged injury occurring on December 21, 2017, and plaintiff failed to establish a basis for tolling the limitations period by more than four years.

KEY QUOTATIONS

“The Court, however, also has the inherent authority to ensure that plaintiff has standing to pursue his claims, that subject matter jurisdiction exists, and that a case is not frivolous.” (Section II.B)

“Accordingly, and for the reasons set forth in the October 2025 Order, plaintiff’s Section 1983 claims are dismissed as untimely, and for lack of subject matter jurisdiction.” (Section II.B)

FACTUAL BACKGROUND

Plaintiff alleged that he was assaulted by a fellow inmate at Greene Correctional Facility on December 21, 2017. He asserted Section 1983 claims against the State of New York and Greene Correctional Facility, construed as Eighth Amendment failure-to-protect claims. Plaintiff was not incarcerated when he commenced the federal action, and his amended complaint remained materially identical to the original pleading.

PROCEDURAL HISTORY

Plaintiff initially filed the action in the Southern District of New York, which transferred it to the Northern District of New York. The court screened the original complaint under 28 U.S.C. § 1915A(b), dismissed the Section 1983 claims without prejudice as barred by the Eleventh Amendment and untimely, and allowed plaintiff an opportunity to amend. Plaintiff's amended complaint was materially identical to the original complaint, and the court dismissed the action with prejudice, directed the Clerk to terminate the defendants, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Rolle v. Berkowitz, No. 03-CV-7120, 2004 WL 287678, at *1 (S.D.N.Y. Feb. 11, 2004)
- Pillay v. INS, 45 F.3d 14, 17 (2d Cir. 1995)
- Cummings v. Giuliani, No. 00-CV-6634, 2000 WL 1597868, at *2-3 (S.D.N.Y. Oct. 24, 2000)
- Cook v. Sullivan Cnty. Fam. Ct. of New York State Unified Ct. Sys., No. 24-CV-03874, 2024 WL 3106248, at *2 (S.D.N.Y. June 20, 2024)
- Fitzgerald v. First E. Seventh St. Tenants Corp., 221 F.3d 362, 364 (2d Cir. 2000)
- Muller v. Costello, No. 94-CV-842, 1996 WL 191977, at *2 (N.D.N.Y. Apr. 16, 1996)
- U.S. v. Hayes, 115 S. Ct. 2431, 2435 (1995)
- Atl. Healthcare Benefits Trust v. Googins, 2 F.3d 1, 4 (2d Cir. 1993)
- Close v. New York, 125 F.3d 31, 38-39 (2d Cir. 1997)
- Collins v. Unified Ct. Sys. of New York, No. 91-CV-349, 1991 WL 111218, at *1 (N.D.N.Y. June 17, 1991), aff'd sub nom. Collins v. Unified Ct. Sys. NY, 962 F.2d 3 (2d Cir. 1992)
- Livingston v. Adirondack Beverage Co., 141 F.3d 434, 437 (2d Cir. 1998)
- Islam v. Melisa, No. 18-CV-2535, 2020 WL 1452463, at *12 (E.D.N.Y. Mar. 24, 2020)
- Castro v. United Sec. Inc., No. 10-CV-6152, 2011 WL 4916402, at *3 (S.D.N.Y. Oct. 17, 2011)
- Pino v. Ryan, 49 F.3d 51, 54 (2d Cir. 1995)

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