

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
LOUISIANA

Adam Smith v. Sheryl M. Ranatza

Civil Action No. 25-106-SDD-SDJ · No. Civil Action No. 25-106-SDD-SDJ · Decided March 17, 2026

SUMMARY

A Magistrate Judge's Report and Recommendation in Adam Smith's 42 U.S.C. § 1983 action concerning Louisiana parole procedures and alleged discrimination against juvenile offenders. The court recommends declining supplemental jurisdiction over potential state-law claims and dismissing the federal claims with prejudice under 28 U.S.C. §§ 1915(e) and 1915A because the requested release is not cognizable under § 1983 and the constitutional claims lack merit.

CASE DETAILS

COURT	United States District Court for the Middle District of Louisiana
WRITING FOR THE COURT	Scott D. Johnson
JURISDICTION	United States District Court for the Middle District of Louisiana
DECIDED	March 17, 2026
DOCKET	Civil Action No. 25-106-SDD-SDJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se incarcerated plaintiff brought a 42 U.S.C. § 1983 action challenging Louisiana parole procedures and seeking injunctive relief, including release from confinement. On screening under 28 U.S.C. §§ 1915(e) and 1915A, the magistrate judge recommended dismissal with prejudice and closure of the case.
STANDARD OF REVIEW	For screening under 28 U.S.C. §§ 1915(e) and 1915A, the court applies the same standard as Federal Rule of Civil Procedure 12(b)(6): well-pleaded facts are accepted as true and viewed in the light most favorable to the plaintiff, but the complaint must contain sufficient factual matter to state a facially plausible claim.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- section 1983
- prisoners rights
- due process
- equal protection
- federal habeas corpus

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

habeas corpus

civil procedure

QUESTIONS PRESENTED

1. Whether Smith's request for release from confinement was cognizable in a 42 U.S.C. § 1983 action.
2. Whether Louisiana parole procedures violated due process despite the absence of a state-created liberty interest in parole.
3. Whether placing juvenile offenders before the regular Louisiana parole board rather than a special board stated an equal protection claim.
4. Whether the court should decline supplemental jurisdiction over potential state-law claims after dismissal of all federal claims.

HOLDINGS

1. A prisoner may not use a § 1983 action to challenge the fact or duration of confinement or obtain release; that relief must be pursued through habeas corpus.
2. Because Louisiana law does not create a protected liberty interest in parole, an inmate cannot state a due process claim challenging the procedures used during a parole hearing.
3. Smith failed to state an equal protection claim because he did not allege disparate treatment from similarly situated individuals or discriminatory intent.
4. The court should decline supplemental jurisdiction over potential state-law claims after recommending dismissal of all claims within its original federal-question jurisdiction.

KEY QUOTATIONS

“ “[A] prisoner in state custody cannot use a § 1983 action to challenge ‘the fact or duration of his confinement.’ ” ” (Section II.B)

“One cannot state an equal protection claim for being treated the same as another group of people—that is the antithesis of discrimination.” (Section II.C)

“IT IS RECOMMENDED that the exercise of supplemental jurisdiction be declined and that this action be DISMISSED WITH PREJUDICE pursuant to 28 U.S.C. §§ 1915(e) and 1915A as legally frivolous and for failure to state a claim and that this case be CLOSED.” (Recommendation)

FACTUAL BACKGROUND

Adam Smith, an incarcerated Louisiana prisoner, alleged that the parole procedures used in his parole proceedings violated the Constitution. He asserted that the absence of special parole procedures or a special parole board for juvenile offenders violated due process and equal protection. His sole requested relief was injunctive relief, including release from confinement.

PROCEDURAL HISTORY

Smith filed the action on February 4, 2025, and was granted in forma pauperis status on February 19, 2025. The magistrate judge issued a Report and Recommendation on March 16, 2026, recommending dismissal of all federal claims as legally frivolous and for failure to state a claim, declining supplemental jurisdiction over potential state-law claims, and closing the case. The notice advised that objections were due within 14 days and that the recommendation required action by the district judge.

DISPOSITION

dismissed

CASES CITED

- Bazrowx v. Scott, 136 F.3d 1053, 1054 (5th Cir. 1998)
- Baker v. Putnal, 75 F.3d 190, 196 (5th Cir. 1996)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- AGEM Management Services, LLC v. First Tennessee Bank Nat. Ass'n, 942 F. Supp. 2d 611, 617 (E.D. La. Apr. 25, 2013)
- Lormand v. U.S. Unwired, Inc., 565 F.3d 228, 255-57 (5th Cir. 2009)
- Wilkinson v. Dotson, 544 U.S. 74, 78 (2005)
- Preiser v. Rodriguez, 411 U.S. 475, 498 (1973)
- Walker v. Miss. Parole Bd., 333 Fed. Appx. 843 (5th Cir. 2009)
- Stevenson v. Louisiana Board of Parole, 265 F.3d 1060 (5th Cir. 2001)
- Hughes v. Owens, 320 Fed. Appx. 271 (5th Cir. 2009)
- Johnson v. Rodriguez, 110 F.3d 299 (5th Cir. 1997)
- Orellana v. Kyle, 65 F.3d 29 (5th Cir. 1995)
- Taylor v. Johnson, 257 F.3d 470 (5th Cir. 2001)