

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN

Sarah Beil v. Pierce County, Janelle Wolf, Sgt. Eric Van Nocker, and
Judge Elizabeth Rohl

Beil v. Pierce County · No. 26-cv-398-jdp · Decided May 12, 2026

SUMMARY

The United States District Court for the Western District of Wisconsin dismissed Sarah Beil’s pro se lawsuit seeking a stay of ongoing Pierce County family-court custody proceedings. The court held that federal intervention was unavailable under Younger abstention principles and directed the clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Western District of Wisconsin
WRITING FOR THE COURT	James D. Peterson
JURISDICTION	United States District Court for the Western District of Wisconsin
DECIDED	May 12, 2026
DOCKET	26-cv-398-jdp
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff proceeding pro se filed a federal action seeking a stay of ongoing Pierce County family-court child-custody proceedings. The district court screened the paid complaint and dismissed the case.
STANDARD OF REVIEW	The court screened the complaint to determine whether it stated a claim for which relief could be afforded and whether it was frivolous.
PRECEDENTIAL VALUE	District court opinion; precedential status not stated
PARTIES	Sarah Beil v. Pierce County, Janelle Wolf, Sgt. Eric Van Nocker, Judge Elizabeth Rohl

TOPICS

- family law procedure
- child custody
- federalism
- civil procedure
- injunctions

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal district court could intervene in and stay ongoing state family-court child-custody proceedings.
2. Whether the pro se plaintiff should be granted leave to amend before dismissal.

HOLDINGS

1. The federal court cannot intervene in ongoing state family-court proceedings involving a contested child-custody dispute and therefore cannot grant the requested stay.
2. Leave to amend is unnecessary when the plaintiff cannot amend the complaint to obtain the relief sought because the requested federal intervention is unavailable.

KEY QUOTATIONS

“I will dismiss this case because this federal court cannot grant Beil the relief that she seeks; this federal court cannot intervene in ongoing state family-court proceedings.”

“Beil’s recourse is in the state-court system, whether by seeking relief in the Pierce County circuit court or in the court of appeals.”

FACTUAL BACKGROUND

Sarah Beil sought a federal stay of ongoing Pierce County family-court proceedings concerning child custody. She alleged that the state court had lost competency because of a purported structural sequence error and a coordinated effort to block her access to the court. The federal court determined that the requested intervention was unavailable.

PROCEDURAL HISTORY

Beil filed this action while Pierce County family-court cases involving child custody were ongoing. Although she paid the filing fee, the district court exercised its inherent authority to screen the complaint, concluded that it could not grant the requested relief because federal courts may not intervene in ongoing state family-court proceedings, and dismissed the case without granting leave to amend.

DISPOSITION

dismissed

CASES CITED

- Rowe v. Shake, 196 F.3d 778, 783 (7th Cir. 1999)
- J.B. v. Woodard, 997 F.3d 714, 722 (7th Cir. 2021)
- Younger v. Harris, 401 U.S. 37 (1971)

- Felton v. City of Chicago, 827 F.3d 632, 636 (7th Cir. 2016)

OPINION

Sarah Beil v. Pierce County, Janelle Wolf, Sgt. Eric Van Nocker, and Judge Elizabeth Rohl
PER CURIAM.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN
SARAH BEIL,

Plaintiff, v. OPINION and ORDER
PIERCE COUNTY, JANELLE WOLF

26-cv-398-jdp SGT. ERIC VAN NOCKER, and
JUDGE ELIZABETH ROHL,

Defendants. Plaintiff Sarah Beil, proceeding without counsel, has filed this lawsuit seeking a stay of Pierce County family court cases involving child custody, No. 2025JC46–2025JC48, contending that the state court has “lost competency to proceed due to a Structural Sequence Error and a coordinated effort to block Plaintiff’s access to the court.” Dkt. 1. Although Beil has paid the entire filing fee, this court retains the inherent authority to screen all complaints to ensure that they state a claim for which relief may be afforded and are not frivolous. *Rowe v. Shake*, 196 F.3d 778, 783 (7th Cir. 1999). I will dismiss this case because this federal court cannot grant Beil the relief that she seeks; this federal court cannot intervene in ongoing state family-court proceedings. See *J.B. v. Woodard*, 997 F.3d 714, 722 (7th Cir. 2021) (citing *Younger v. Harris*, 401 U.S. 37 (1971) (federal courts cannot adjudicate claims that take aim at a contested and ongoing family court custody dispute)). Beil’s recourse is in the state-court system, whether by seeking relief in the Pierce County circuit court or in the court of appeals. When a plaintiff proceeds without counsel, the court of appeals has cautioned against dismissing her case without giving her a chance to amend the complaint. *Felton v. City of Chicago*, 827 F.3d 632, 636 (7th Cir. 2016). But dismissal of this lawsuit is appropriate because there isn’t any reason to think that Beil could amend her complaint to obtain the relief that she seeks.

ORDER

IT IS ORDERED that:

1. This case is DISMISSED.
2. The clerk of court is directed to enter judgment accordingly and close the case.

Entered May 12, 2026. BY THE COURT: /s/ _____

JAMES D. PETERSON

District Judge