

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Ealom v. Parker, et al.

Ealom · No. 1:26-cv-78 · Decided March 16, 2026

SUMMARY

The United States District Court for the Northern District of Ohio considers Emanuel Ealom’s civil rights claims against a probation officer and Cuyahoga County arising from an alleged probation violation and arrest warrant. The court grants in forma pauperis status, denies injunctive relief and a temporary restraining order, and applies Younger abstention because related state probation proceedings remain pending. The court stays and administratively closes the federal case pending completion of the state proceedings and any appeals.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	J. Philip Calabrese
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	March 16, 2026
DOCKET	1:26-cv-78
DISPOSITION	other
PROCEDURAL POSTURE	A pro se plaintiff brought a civil-rights action under federal law challenging probation-violation proceedings and an arrest warrant, seeking injunctive relief and monetary damages. The district court granted leave to proceed in forma pauperis, denied injunctive relief and a temporary restraining order under Younger abstention, and stayed the damages claims pending completion of the state proceedings and appeals.
STANDARD OF REVIEW	For in forma pauperis screening, the court determines whether the action fails to state a claim or lacks an arguable basis in law or fact. Pro se pleadings are liberally construed, but the complaint must satisfy the plausibility pleading standard. Younger abstention is assessed under whether state proceedings are ongoing, implicate important state interests, and provide an adequate opportunity to raise federal questions.

PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Emanuel Ealom v. Teona Parker, Cuyahoga County, Ohio

TOPICS

injunctions civil procedure due process civil rights damages

PRACTICE AREAS

Civil rights Federal civil procedure Criminal procedure Constitutional law Federalism

QUESTIONS PRESENTED

1. Whether the court should grant the pro se plaintiff's application to proceed in forma pauperis.
2. Whether Younger abstention required the federal court to deny injunctive relief that would interfere with ongoing state probation-violation proceedings.
3. Whether the plaintiff's claims for monetary damages should be stayed pending completion of the related state proceedings and any appeals.

HOLDINGS

1. The court granted the plaintiff's application to proceed in forma pauperis.
2. Younger abstention required the federal court to refrain from interfering with the ongoing state probation-violation proceedings and to deny the plaintiff's request for injunctive relief and temporary restraining order.
3. The court stayed the plaintiff's claims for monetary damages until the state probation-violation proceedings, including all appeals, concluded.

KEY QUOTATIONS

"[I]t is well established that federal courts are courts of limited jurisdiction, possessing only that power authorized by the Constitution and statute." (Analysis)

"The Court will not interfere in a criminal case pending in State court by deciding issues that are central to that case." (Analysis)

FACTUAL BACKGROUND

Ealom pleaded guilty in state court to aggravated assault, domestic violence, and theft and received two years of probation. He alleged that his probation officer coerced him into signing a second, more restrictive supervision agreement and fabricated or improperly pursued probation violations. After a probation-violation charge was filed, he failed to appear at a probable-cause hearing, leading the state court to issue an arrest warrant that appeared to remain active. He filed the federal action seeking damages, an order voiding the warrant, and expungement of his conviction while the state probation-violation matter remained pending.

PROCEDURAL HISTORY

Ealom was convicted in Cuyahoga County Court of Common Pleas and placed on probation. After an alleged probation violation, he failed to appear at a probable-cause hearing, and the state court issued an arrest warrant. He then filed this federal action against his probation officer and Cuyahoga County. The district court granted in forma pauperis status, denied requests for injunctive relief, stayed the monetary claims, and administratively closed the case subject to reopening after the state probation proceedings and any appeals conclude.

DISPOSITION

other

CASES CITED

- Boag v. MacDougall, 454 U.S. 364, 365 (1982) (per curiam)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Neitzke v. Williams, 490 U.S. 319, 327-28 (1989)
- Lawler v. Marshall, 898 F.2d 1196 (6th Cir. 1990)
- Sistrunk v. City of Strongsville, 99 F.3d 194, 197 (6th Cir. 1996)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 564 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- Papasan v. Allain, 478 U.S. 265, 286 (1986)
- Bibbo v. Dean Witter Reynolds, Inc., 151 F.3d 559, 561 (6th Cir. 1998)
- Lathan v. Goulding, No. 3:16-CV-01519, 2018 WL 3222594, at *2 (N.D. Ohio July 2, 2018)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Hudson v. Coleman, 347 F.3d 138, 141 (6th Cir. 2003)
- Younger v. Harris, 401 U.S. 37, 41, 44-45 (1971)
- Watts v. Burkhardt, 854 F.2d 839, 844-48 (6th Cir. 1988)
- Pennzoil Co. v. Texaco, Inc., 481 U.S. 1, 14-15 (1987)
- Middlesex County Ethics Committee v. Garden State Bar Association, 457 U.S. 423, 432 (1982)
- Moore v. Sims, 442 U.S. 415, 430 (1979)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION EMANUEL EALOM,) Case No. 1:26-cv-78) Plaintiff,) Judge J. Philip Calabrese) v.) Magistrate Judge) James E. Grimes, Jr. TEONA PARKER, et al.,)) Defendants.)) OPINION AND ORDER Proceeding without a lawyer, Plaintiff Emanuel Ealom filed this civil rights action against Teona Parker, a Cuyahoga County Probation Officer, and Cuyahoga County, Ohio. Plaintiff challenges a warrant issued for his arrest for probation violations, claiming his probation officer denied him due process.

Further, he contends that Cuyahoga County is liable for failing to train or supervise Ms. Parker. He seeks monetary relief and an order voiding the arrest warrant and expunging his criminal conviction. STATEMENT OF FACTS Mr. Ealom's complaint is very brief. He indicates that he challenges an alleged probation violation imposed in State v. Ealom, No. CR-24-691775 -A (Cuyahoga Cnty.

Ct. Com. Pl.). He states that Ms. Parker, his probation officer, coerced him into violating the conditions of his probation through threats and deprivation of due process. (ECF. No. 1, PageID #2.) He alleges that she admitted liability in a deposition and refers the Court to Exhibit A, which he did not provide. He states that his criminal case was closed on January 7, 2024.

This statement is not supported by the State court docket, which shows that his criminal case was not filed until May 7, 2024. He alleges that a "baseless warrant" was issued against him after the case was closed. He provides no explanation for any of these statements.

The docket in his criminal case provides some indication of what took place. Mr. Ealom was indicted on May 7, 2024 and charged with aggravated assault, felonious assault, domestic violence, aggravated menacing, disrupting public services, and aggravated theft. See State v. Ealom, No. CR-24-691775-A (Cuyahoga Cnty. Ct. Com. Pl.). He entered into a plea agreement on February 25, 2025 in which he pled guilty to aggravated assault, domestic violence, and theft in exchange for dismissal of the other charges.

On March 4, 2025, the State trial court sentenced Mr. Ealom to 2 years of probation. The State trial court transferred his probation first to the high risk supervision unit and then ten days later to the domestic violence unit. Id. Mr. Ealom contends that his probation officer threatened him with imprisonment if he did not agree to sign a second probation supervision agreement.

(ECF No. 3-7, PageID #20.) He claims the terms of this agreement were stricter than the terms in the original contract. (Id.) On April 23, 2025, he was charged with violating the terms of his probation. Mr. Ealom claims he had no written notice of the violation before the hearing. (Id.) Also, he claims that his alleged conduct does not constitute a violation under the terms of his original supervision agreement.

(Id.) He demanded a probable cause hearing, which the court set for the following day. State v. Ealom, No. CR-24- 691775-A (Cuyahoga Cnty. Ct. Com. Pl.). He failed to appear at that hearing, and the State trial court issued a warrant for his arrest. (Id.) It appears from the docket that the warrant remains active. (Id.) STATEMENT OF THE CASE Plaintiff asserts two legal claims.

First, he claims that Ms. Parker denied him due process. He alleges that she coerced him to sign a second agreement and then fabricated probation violations. Second, he claims that Cuyahoga County should be held liable for Ms. Parker's actions, claiming that the County failed adequately

to train or supervise her. He seeks monetary relief and an order voiding the arrest warrant and expunging his criminal conviction.

Also, Plaintiff seeks to proceed in forma pauperis. (ECF No. 5.) The Court GRANTS that application. ANALYSIS Pro se pleadings are liberally construed. *Boag v. MacDougall*, 454 U.S. 364, 365 (1982) (per curiam); *Haines v. Kerner*, 404 U.S. 519, 520 (1972).

The district court, however, is required to dismiss an in forma pauperis action under 28 U.S.C. § 1915(e) if it fails to state a claim on which relief can be granted or if it lacks an arguable basis in law or fact. *Neitzke v. Williams*, 490 U.S. 319, 328 (1989); *Lawler v. Marshall*, 898 F.2d 1196 (6th Cir. 1990); *Sistrunk v. City of Strongsville*, 99 F.3d 194, 197 (6th Cir.

1996). A claim lacks an arguable basis in law or fact where it is premised on an indisputably meritless legal theory or where the factual contentions are clearly baseless. *Neitzke*, 490 U.S. at 327. A cause of action fails to state a claim on which relief may be granted where it lacks “plausibility in the complaint.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 564 (2007).

In any civil action, a pleading must contain a “short and plain statement of the claim showing that the pleader is entitled to relief.” *Ashcroft v. Iqbal*, 556 U.S. 662, 677–78 (2009). The factual allegations in the pleading must be sufficient to raise the right to relief above the speculative level on the assumption that all the allegations in the complaint are true.

Twombly, 550 U.S. at 555. The plaintiff is not required to include detailed factual allegations, but he must provide more than “an unadorned, the defendant unlawfully harmed me accusation.” *Iqbal*, 556 U.S. at 678. A pleading that offers legal conclusions or a simple recitation of the elements of a cause of action does not meet this pleading standard. *Id.* The Court is “not bound to accept as true a legal conclusion couched as a factual allegation.” *Papasan v. Allain*, 478 U.S. 265, 286 (1986).

In reviewing a complaint, the Court must construe the pleading in the light most favorable to the plaintiff. *Bibbo v. Dean Witter Reynolds, Inc.*, 151 F.3d 559, 561 (6th Cir. 1998). The Court cannot grant Plaintiff’s requested relief. Federal courts do not have legal authority to intervene in a pending State court action, compel a State court judge to rule differently, or dismiss criminal charges brought in State court.

See, e.g., *Lathan v. Goulding*, No. 3:16-CV-01519, 2018 WL 3222594, at *2 (N.D. Ohio July 2, 2018). Federal district courts are not appellate courts over the State court system and have no general power to control State court actions. Rather, federal district courts are courts of limited jurisdiction, and their powers are enumerated in Article III of the Constitution.

Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994). “[I]t is well established that federal courts are courts of limited jurisdiction, possessing only that power authorized by the

Constitution and statute.”. *Hudson v. Coleman*, 347 F.3d 138, 141 (6th Cir. 2003). Further, the structure of our government urges federal courts to abstain from exercising jurisdiction over a claim when ruling on the claim would interfere with ongoing State proceedings.

See *Younger v. Harris*, 401 U.S. 37, 41 (1971) (“[W]e have concluded that the judgment of the District Court, enjoining appellant Younger from prosecuting under these California statutes, must be reversed as a violation of the national policy forbidding federal courts to stay or enjoin pending state court proceedings except under special circumstances.’).” When a person is the target of an ongoing state action involving important state matters, he cannot interfere with the pending State action by maintaining a parallel federal action involving claims that could have been raised in the State case.

Watts v. Burkhart, 854 F.2d 839, 844–48 (6th Cir. 1988). If the State files such a case, Younger abstention requires the federal court to defer to the State proceeding. *Id.*; see also *Pennzoil Co. v. Texaco, Inc.*, 481 U.S. 1, 15 (1987). Based on these principles, abstention is appropriate where: (1) State proceedings are ongoing; (2) the State proceedings implicate important State interests; and (3) the State proceedings afford an adequate opportunity to raise federal questions.

Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass’n, 457 U.S. 423, 432 (1982). Abstention is mandated whether the State court proceeding is criminal, quasi-criminal, or civil in nature as long as federal court intervention “unduly interferes with the legitimate activities of the state.” *Younger*, 401 U.S. at 44. All three factors are present here. Plaintiff is the defendant in an on-going criminal case in State court.

The criminal case is “closed” because Plaintiff was convicted of the crimes to which he pled guilty. The probation violation, however, is still pending on the docket and a warrant is still active. Further, State court criminal matters are a paramount interest of the State. See *Younger*, 401 U.S. at 44–45. Plaintiff’s claim that he was denied due process in the probation violation process goes to the heart of the pending proceedings.

The third requirement of *Younger* is that Plaintiff must have an opportunity to assert his federal challenges in the State court proceeding. The pertinent inquiry is whether the State proceedings afford an adequate opportunity to raise the federal claims, not whether Plaintiff was successful in obtaining the relief he requested. *Moore v. Sims*, 442 U.S. 415, 430 (1979).

The burden at this point rests on the Plaintiff to demonstrate that State procedural law bars presentation of his claims. *Pennzoil*, 481 U.S. at 14. Plaintiff filed motions in his criminal case raising these claims. Most recently, he filed an affidavit on January 9, 2026 and a petition for a writ of mandamus on January 15, 2026.

The petition remains pending. *State v. Ealom*, No. CR-24-691775-A (Cuyahoga Cnty. Ct Com. Pl.). Moreover, if the petition is denied, Plaintiff still has the opportunity to raise those arguments

on appeal. For these reasons, the Court finds that the Younger doctrine applies and requires federal abstention in this case.

The Court will not interfere in a criminal case pending in State court by deciding issues that are central to that case. Therefore, the Court DENIES Plaintiff's request for injunctive relief and his motion for a temporary restraining order (ECF No. 6).

To the extent Plaintiff seeks monetary damages, the Court must stay this case until his State-court case (including any appeals) have concluded CONCLUSION For the foregoing reasons, the Court GRANTS Plaintiff 's application to proceed in forma pauperis (ECF No. 5) and STAYS all proceedings in this case pending the conclusion of the probation violation proceedings in State v. Ealom, No. CR-24-691775-A (Cuyahoga Cnty.

Ct. Com. Pl.), including all appeals. Until that time, the Court administratively closes this case, subject to reopening on a written motion demonstrating that the case listed above and all appeals in that case have been resolved or concluded. No claims or defenses are waived as a result of the stay.

Because this case is stayed, from this point forward, the only motion that the Court will entertain is a motion to reopen that demonstrates that the State court probation violation proceedings in Case No. CR-24-691775-A and all appeals have been resolved. SO ORDERED. Dated: March 16, 2026 J. Philip Calabrese United States District Judge Northern District of Ohio