

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Jessie Adams v. Sergio Jimenez

Adams · No. 1:26-cv-214 · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Michigan dismisses a pro se complaint for lack of subject-matter jurisdiction and failure to state a plausible claim. The court concludes that the allegations of conspiracy and ex parte communications are wholly conclusory and that invoking federal law does not establish jurisdiction. The dismissal is entered following review under Federal Rule of Civil Procedure 12(h)(3) and 28 U.S.C. § 1915(e)(2).

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Hala Y. Jarbou
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	January 23, 2026
DOCKET	1:26-cv-214
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff, proceeding pro se and in forma pauperis, filed a one-page complaint. The district court sua sponte determined that it lacked subject-matter jurisdiction and dismissed the action.
STANDARD OF REVIEW	The court independently considered subject-matter jurisdiction sua sponte and applied the pleading standard for an in forma pauperis complaint under 28 U.S.C. § 1915(e)(2)(B).
PRECEDENTIAL VALUE	nonprecedential district court opinion

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure
- due process

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the complaint established federal subject-matter jurisdiction.
2. Whether the action could proceed under the in forma pauperis screening standard when the complaint was frivolous, unsubstantial, and failed to state a plausible claim.

HOLDINGS

1. The complaint did not establish federal subject-matter jurisdiction because its allegations were unsubstantial, wholly conclusory, and unsupported by facts.
2. The action was subject to dismissal under 28 U.S.C. § 1915(e)(2)(B) because the complaint was frivolous or failed to state a plausible claim for relief.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction” (511 U.S. at 377)

“possess only that power authorized by Constitution and statute.” (511 U.S. at 377)

“It is to be presumed that a cause lies outside this limited jurisdiction, and the burden of establishing the contrary rests upon the party asserting jurisdiction.” (511 U.S. at 377)

“Here, the Court lacks subject matter jurisdiction because the complaint is unsubstantial.”

FACTUAL BACKGROUND

Adams filed a one-page complaint alleging, on information and belief, that Jimenez had ex parte communications with certain individuals and had conspired with others in violation of due process. The complaint stated only that federal law supplied jurisdiction and provided no supporting factual allegations. The court found the assertions wholly conclusory and the jurisdictional assertion merely a legal conclusion.

PROCEDURAL HISTORY

Jessie Adams filed a complaint alleging ex parte communications and conspiracy in violation of due process, while identifying federal law as the basis for jurisdiction. The district court concluded that the complaint was unsubstantial, lacked factual allegations establishing jurisdiction, and was conclusory. The court dismissed the case and stated that judgment would enter in accordance with the opinion.

DISPOSITION

dismissed

CASES CITED

- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)

- Gonzalez v. Thaler, 565 U.S. 134, 141 (2012)
- Vander Boegh v. EnergySolutions, Inc., 772 F.3d 1056, 1064 (6th Cir. 2014)
- Arbaugh v. Y & H Corp., 546 U.S. 500, 514 (2006)
- Apple v. Glenn, 183 F.3d 477, 479 (6th Cir. 1999)
- Hill v. Lappin, 630 F.3d 468, 471 (6th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)

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