

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
OKLAHOMA

Janice Lynn Jones v. State of Oklahoma, et al.

Jones · No. CIV-25-1383-R · Decided November 25, 2025

SUMMARY

The United States District Court for the Western District of Oklahoma finds that Janice Lynn Jones’s pro se civil-rights complaint concerning child protective services and state-court custody proceedings is deficient under Federal Rule of Civil Procedure 8. The Court also identifies frivolous sovereign-citizen theories, non-suable defendants and immunity issues, the absence of private causes of action under cited criminal statutes, improper § 2241 claims, and potential Rooker-Feldman barriers. The Court permits Plaintiff to file an amended complaint by December 15, 2025, warning that failure to do so will result in dismissal without prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of Oklahoma
WRITING FOR THE COURT	David L. Russell
JURISDICTION	United States District Court for the Western District of Oklahoma
DECIDED	November 25, 2025
DOCKET	CIV-25-1383-R
DISPOSITION	other
PROCEDURAL POSTURE	The court sua sponte reviewed a pro se civil-rights complaint and found it deficient under multiple procedural and substantive doctrines. Rather than immediately dismissing the action, the court granted Plaintiff leave to file an amended complaint.
STANDARD OF REVIEW	The court conducted sua sponte review under its inherent authority to manage its docket and evaluated the sufficiency and plausibility of the complaint under Federal Rules of Civil Procedure 8 and 10.
PRECEDENTIAL VALUE	Unknown; district-court order with no reporter citation and metadata indicating unknown precedential status.
PARTIES	Janice Lynn Jones v. State of Oklahoma, et al.

TOPICS

pleadings

civil procedure

section 1983

subject matter jurisdiction

eleventh amendment immunity

PRACTICE AREAS

civil procedure

civil rights

constitutional law

family law

QUESTIONS PRESENTED

1. Whether the complaint complied with Federal Rules of Civil Procedure 8(a)(2), 8(d), and 10(b).
2. Whether the complaint stated plausible claims by providing fair notice of each defendant's alleged conduct and personal participation.
3. Whether sovereign-citizen theories were legally cognizable.
4. Whether governmental entities, the State of Oklahoma, state agencies, official-capacity defendants, and state-court judges were suable or immune from the asserted claims.
5. Whether federal criminal statutes 18 U.S.C. §§ 241 and 242 supplied private civil causes of action.
6. Whether Plaintiff could combine purported claims under 28 U.S.C. § 2241 with § 1983 claims in this action and whether the children satisfied the habeas corpus custody requirement.
7. Whether the Rooker-Feldman doctrine deprived the district court of jurisdiction over claims seeking review of, or relief for injuries caused by, a state-court custody judgment.
8. Whether Plaintiff should be permitted to amend the complaint before dismissal.

HOLDINGS

1. A complaint that is lengthy, disjointed, unclear as to which defendant is being sued for which conduct, and not organized into clear, separately stated claims fails to satisfy Federal Rules of Civil Procedure 8 and 10.
2. A complaint must allege sufficient nonconclusory facts identifying what each defendant did, when the defendant did it, how the plaintiff was harmed, and what legal right was violated.
3. Sovereign-citizen arguments are frivolous and may be summarily rejected.
4. Governmental subunits that are not separate legal entities generally are not suable under 42 U.S.C. § 1983; the Eleventh Amendment generally bars federal damages actions against a state, its agencies, and state officers sued in their official capacities; and state-court judges are absolutely immune for acts taken in their judicial capacity unless they acted outside that capacity or in the complete absence of jurisdiction.
5. Federal criminal statutes 18 U.S.C. §§ 241 and 242 do not provide private civil causes of action.
6. The asserted § 2241 claims were not cognizable as pleaded because the children were not shown to be in custody within the meaning of the habeas statutes, Plaintiff's authority to sue on their behalf was unclear, and the circumstances did not support combining the purported § 2241 and § 1983 claims in one action.
7. The Rooker-Feldman doctrine bars a federal district court from exercising jurisdiction over claims seeking review of a state-court judgment or claims inextricably intertwined with that judgment when the

state-court judgment caused the injury for which relief is sought.

8. A pro se plaintiff whose complaint is deficient may be given an opportunity to cure the deficiencies through an amended complaint that complies with the Federal Rules of Civil Procedure and identifies the jurisdictional and factual basis for each claim.

KEY QUOTATIONS

“The broad reading of the plaintiff’s complaint does not relieve the plaintiff of the burden of alleging sufficient facts on which a recognized legal claim could be based.”

“At bottom, the Rooker–Feldman doctrine instructs that “errors in state cases should be reviewed and settled through the state appellate process.””

FACTUAL BACKGROUND

Plaintiff alleged civil-rights violations against more than forty defendants, including state agencies, state employees, state-court judges, the Oklahoma Supreme Court, municipal police departments, attorneys, and others. Her allegations appeared to arise from a child protective services investigation and/or state-court child-custody proceeding. She also invoked sovereign-citizen theories, cited federal criminal statutes, sought relief under 42 U.S.C. § 1983 and 28 U.S.C. § 2241, and alleged that her minor children were being unlawfully detained.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint alleging civil-rights violations arising from a child protective services investigation and/or state-court child-custody proceeding. The district court determined that the complaint violated Federal Rules of Civil Procedure 8 and 10, asserted frivolous sovereign-citizen theories, named non suable or immune defendants, relied on criminal statutes without private causes of action, improperly combined purported habeas and § 1983 claims, and appeared to challenge injuries caused by a state-court judgment. The court allowed Plaintiff until December 15, 2025, to file an amended complaint and warned that failure to do so would result in dismissal without prejudice.

DISPOSITION

other

CASES CITED

- Hall v. Bellmon, 935 F.2d 1106, 1110 (10th Cir. 1991)
- Mallard v. U.S. Dist. Ct. for S. Dist. of Iowa, 490 U.S. 296, 307-08 (1989)
- Williams v. Madden, 9 F. App’x 996, 997 n.1 (10th Cir. 2001)
- Webster v. Palk, No. 21-4057-JWB-GEB, 2021 WL 4893015, at *2 (D. Kan. Oct. 20, 2021)
- Mann v. Boatright, 477 F.3d 1140, 1148 (10th Cir. 2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 (2007)

- *Nasious v. Two Unknown B.I.C.E. Agents*, 492 F.3d 1158, 1163 (10th Cir. 2007)
- *United States v. Palmer*, 699 F. App'x 836, 838 (10th Cir. 2017)
- *Hinton v. Dennis*, 362 F. App'x 904, 907 (10th Cir. 2010)
- *Agrawal v. Cts. of Oklahoma*, 2018 WL 3354881, at *2 (W.D. Okla. July 9, 2018), *aff'd*, 764 F. App'x 809 (10th Cir. 2019)
- *Martin v. Box*, 2009 WL 1605657, at *5 (W.D. Okla. June 5, 2009)
- *Peterson v. Martinez*, 707 F.3d 1197, 1205 (10th Cir. 2013)
- *Pettigrew v. Okla. ex rel. Okla. Dep't of Public Safety*, 722 F.3d 1209, 1212 (10th Cir. 2013)
- *Will v. Mich. Dep't of State Police*, 491 U.S. 58, 70-71 (1989)
- *Stump v. Sparkman*, 435 U.S. 349, 355-357 (1978)
- *Mireles v. Waco*, 502 U.S. 9, 11 (1991)
- *Guttman v. Khalsa*, 446 F.3d 1027, 1034 (10th Cir. 2006)
- *Kelly v. Rockefeller*, 69 F. App'x 414, 415 (10th Cir. 2003)
- *Dry v. CFR Ct. of Indian Offenses for Choctaw Nation*, 168 F.3d 1207, 1208 (10th Cir. 1999)
- *Whitmore v. Parker*, 484 F. App'x 227, 240 (10th Cir. 2012)
- *Adams v. Rankin*, 2025 WL 2048327, at *5 (W.D. Okla. June 9, 2025), report and recommendation adopted, 2025 WL 2045596 (W.D. Okla. July 21, 2025)
- *Lance v. Dennis*, 546 U.S. 459, 460 (2006)
- *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005)
- *Kanth v. Lubeck*, 123 F. App'x 921, 924 (10th Cir. 2005)
- *Tal v. Hogan*, 453 F.3d 1244, 1256 & n.11 (10th Cir. 2006)
- *Davis v. TXO Prod. Corp.*, 929 F.2d 1515, 1517 (10th Cir. 1991)