

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, SOUTHERN DIVISION

John Raymond Bower v. Henry T. Reagan, II

Bower · No. 1:25-cv-938-ECM · Decided December 3, 2025

SUMMARY

The United States District Court for the Middle District of Alabama dismissed John Raymond Bower’s § 1983 action against an Alabama state-court judge without prejudice for lack of subject-matter jurisdiction. The court held that Bower’s constitutional challenges to a divorce judgment awarding custody and permitting relocation of the parties’ minor child to Saudi Arabia were barred by the Rooker-Feldman doctrine. The court denied his pending requests for injunctive relief as moot and permitted him to file an amended complaint addressing the jurisdictional defect.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Southern Division
WRITING FOR THE COURT	Emily C. Marks
JURISDICTION	United States District Court for the Middle District of Alabama, Southern Division
DECIDED	December 3, 2025
DOCKET	1:25-cv-938-ECM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action in federal district court against a state-court judge in his official capacity, challenging a divorce judgment's custody and relocation provisions and seeking declaratory and injunctive relief. The district court sua sponte dismissed the complaint without prejudice for lack of subject-matter jurisdiction under the Rooker-Feldman doctrine.
STANDARD OF REVIEW	The court independently examined whether subject-matter jurisdiction existed before reaching the merits.
PRECEDENTIAL VALUE	unknown
PARTIES	John Raymond Bower v. Henry T. Reagan, II

TOPICS

family law procedure

relocation

child custody

subject matter jurisdiction

civil procedure

PRACTICE AREAS

family law

constitutional law

civil rights

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether Rooker-Feldman barred Bower's First Amendment Establishment Clause claim challenging the state court's custody and relocation findings.
2. Whether Rooker-Feldman barred Bower's substantive due process claim alleging that the relocation provisions effectively terminated his parental rights without a finding of unfitness.
3. Whether Rooker-Feldman barred Bower's procedural due process and Citizenship Clause claim alleging that the relocation order effected the forced expatriation of a minor without adequate investigation.
4. Whether the complaint should be dismissed without prejudice for lack of subject-matter jurisdiction and whether the pending requests for injunctive relief should be denied as moot.

HOLDINGS

1. Rooker-Feldman barred Bower's Establishment Clause claim because the claim alleged injury caused by the state court's custody and relocation judgment and sought declaratory and injunctive relief that would require the federal district court to review and reject that judgment.
2. Rooker-Feldman barred Bower's substantive due process claim because the alleged constitutional injury was the state court's relocation judgment itself, and the requested declaratory relief would effectively nullify that judgment.
3. Rooker-Feldman barred Bower's procedural due process and Citizenship Clause claim because it alleged constitutional injury from the state court's relocation judgment and required the federal court to review and reject that judgment.
4. The complaint was dismissed without prejudice for lack of subject-matter jurisdiction under Rooker-Feldman; the motions for a temporary restraining order, preliminary injunction, and expedited review were denied as moot, and Bower was permitted to file an amended complaint curing the jurisdictional defect.

KEY QUOTATIONS

“state court litigants do not have a right of appeal in the lower federal courts”

“cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments.”

“The question isn’t whether the whole complaint seems to challenge a previous state court judgment, but whether resolution of each individual claim requires review and rejection of a state court judgment.”

FACTUAL BACKGROUND

A state-court divorce judgment awarded Bower and his former wife joint legal custody of their minor child, awarded the former wife sole physical custody, and permitted her to relocate with the child to Saudi Arabia. The state court found relocation to be in the child's best interest, including because it would positively affect the child's ability to practice Islam and might help the child feel that he fit in better in Saudi Arabia. Bower alleged that the judgment violated the Establishment Clause, substantive and procedural due process, and the Citizenship Clause, and sought to prevent enforcement of the relocation provisions.

PROCEDURAL HISTORY

The Coffee County, Alabama, Circuit Court entered a Final Judgment of Divorce awarding the parents joint legal custody, awarding the mother sole physical custody, and permitting relocation of the minor child to Saudi Arabia. Bower filed this federal action alleging First and Fourteenth Amendment violations and moved for a temporary restraining order, preliminary injunction, and expedited review. The district court dismissed the complaint without prejudice under Rooker-Feldman, denied the pending motions as moot, and allowed Bower to amend to cure the jurisdictional defect.

DISPOSITION

dismissed

CASES CITED

- Jacobson v. Fla. Sec'y of State, 974 F.3d 1236 (11th Cir. 2020)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Behr v. Campbell, 8 F.4th 1206 (11th Cir. 2021)
- Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280 (2005)
- Efron v. Candelario, 110 F.4th 1229 (11th Cir. 2024)
- Alvarez v. Att'y Gen. of Fla., 679 F.3d 1257 (11th Cir. 2012)
- Tarver v. Tarver, 2022 WL 4372439 (11th Cir. Sept. 22, 2022) (per curiam)