

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Dominique Jamal Williams v. Ruth Anne Thorton

Williams v. Thorton · No. 4:25-cv-13122-JD · Decided May 5, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s Report and Recommendation and dismisses without prejudice a pro se plaintiff’s constitutional claims arising from child-support enforcement actions. The court concludes that the Rooker-Feldman doctrine deprives it of subject-matter jurisdiction and notes that no objections were filed.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph Dawson, III
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	May 5, 2026
DOCKET	4:25-cv-13122-JD
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation on initial review of a pro se amended complaint. No specific objections were filed, and the district court adopted the recommendation and dismissed the action without prejudice and without issuance and service of process.
STANDARD OF REVIEW	When no specific objections are filed to a magistrate judge's Report and Recommendation, the district court need not conduct de novo review and need only satisfy itself that there is no clear error on the face of the record.
PRECEDENTIAL VALUE	unpublished
PARTIES	Dominique Jamal Williams v. Ruth Anne Thorton

TOPICS

- subject matter jurisdiction
- civil procedure
- due process
- section 1983
- appellate procedure

PRACTICE AREAS

civil procedure

constitutional law

civil rights

family law

appellate procedure

QUESTIONS PRESENTED

1. Whether the district court should review the magistrate judge's Report and Recommendation for clear error when no specific objections were filed.
2. Whether the district court had subject-matter jurisdiction over a § 1983 action seeking relief from injuries allegedly caused by state child-support orders and related enforcement actions under the Rooker-Feldman doctrine.

HOLDINGS

1. When no specific objections are filed, the district court is not required to conduct de novo review and need only determine whether the record contains clear error.
2. The district court lacks subject-matter jurisdiction under the Rooker-Feldman doctrine over claims that seek relief for injuries caused by state-court child-support determinations when resolving the claims would require the federal court to review or invalidate those state-court orders.

KEY QUOTATIONS

"this action is DISMISSED WITHOUT PREJUDICE and without issuance and service of process." (E. Conclusion)

"federal district courts may not review or set aside final judgments of state courts" (B. Report and Recommendation)

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, challenged child-support enforcement actions allegedly including wage garnishment, suspension of an occupational license, and issuance of enforcement orders. He alleged that the actions were taken without lawful authority, notice, or a hearing and violated due process and access-to-courts rights. The challenged actions arose from state child-support and income-withholding orders in proceedings to which Plaintiff was a party.

PROCEDURAL HISTORY

Plaintiff initiated a § 1983 action challenging child-support enforcement actions. After initial review, the magistrate judge directed Plaintiff to amend because the original complaint failed to state sufficient facts. Plaintiff filed an amended complaint, and the magistrate judge recommended dismissal without prejudice for lack of subject-matter jurisdiction under the Rooker-Feldman doctrine. Plaintiff filed no objections, so the district court reviewed the record for clear error, found none, adopted the Report, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- United States v. Schronce, 727 F.2d 91, 94 & n.4 (4th Cir. 1984)
- Diamond v. Colonial Life & Accident Ins. Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Thomas v. Arn, 474 U.S. 140, 147 (1985)
- Camby v. Davis, 718 F.2d 198, 199 (4th Cir. 1983)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA
Dominique Jamal Williams,) Case No.: 4:25-cv-13122-JD) Plaintiff,)) vs.)) ORDER Ruth
Anne Thorton,) Defendant.))) This matter is before the Court on the Report and
Recommendation (“Report”) of United States Magistrate Judge Kaymani D. West (DE 29), issued
pursuant to 28 U.S.C. § 636(b) and Local Civil Rule 73.02(B)(2) (D.S.C.) of the District of South
Carolina, concerning the initial review of Plaintiff Dominique Jamal Williams’s (“Plaintiff”) pro se
Amended Complaint (DE 25).¹ A. Background The Court incorporates the factual and procedural
background set forth in the Report and Recommendation (DE 29).

A brief summary is provided for context. Plaintiff, proceeding pro se, initiated this civil action on
October 24, 2025, alleging violations of his constitutional rights under 42 U.S.C. § 1983 arising
from the enforcement of child-support obligations and related actions taken by Defendant, ¹ The
recommendation has no presumptive weight, and the responsibility for making a final
determination remains with the United States District Court.

See Mathews v. Weber, 423 U.S. 261, 270-71 (1976). The court is charged with making a de novo
determination of those portions of the Report and Recommendation to which specific objection is
made. The court may accept, reject, or modify, in whole or in part, the recommendation made by
the magistrate judge or recommit the matter with instructions. 28 U.S.C. § 636(b)(1).

Ruth Anne Thorton, Director of the Texas Office of the Attorney General’s Title IV-D Child
Support Division. (DE 1.) Following initial review, the Magistrate Judge issued an order notifying
Plaintiff that his Complaint was subject to summary dismissal because it failed to allege sufficient
facts to state a claim and directing Plaintiff to file an amended complaint to cure the identified
deficiencies.

(DE 21.) Plaintiff thereafter filed a First Amended Complaint on February 6, 2026. (DE 25.) In the
Amended Complaint, Plaintiff alleges that certain child-support enforcement actions, including
wage garnishment, suspension of his occupational license, and issuance of enforcement orders,
were undertaken without lawful authority, notice, or a hearing, in violation of his due process
rights and right of access to the courts.

(DE 25 at 3–4.) Plaintiff seeks declaratory and injunctive relief, as well as monetary damages, for alleged constitutional injuries arising from those enforcement actions. (Id. at 5–6.) B. Report and Recommendation On February 12, 2026, the Magistrate Judge issued the present Report recommending that the Amended Complaint be dismissed without prejudice and without issuance and service of process.

(DE 29.) The Report explains that Plaintiff challenges the enforcement of state child-support and income-withholding orders and alleges that those enforcement actions violated his constitutional rights, including his rights to due process and access to the courts. (Id.)

The Magistrate Judge concluded that this Court lacks subject-matter jurisdiction over Plaintiff’s claims under the Rooker-Feldman doctrine, which provides that federal district courts may not review or set aside final judgments of state courts (DE 29). See *Rooker v. Fidelity Trust Co.*, 263 U.S. 413 (1923).

The Report notes that Plaintiff was a party to the underlying state court proceedings that resulted in the challenged child-support orders and that the injuries alleged in this action stem directly from those state court determinations. (Id.)

The Magistrate Judge further determined that granting the relief Plaintiff seeks would necessarily require this Court to review and invalidate those state court orders, which is prohibited under the Rooker-Feldman doctrine. (Id.)

Accordingly, the Magistrate Judge recommends that the Amended Complaint be dismissed without prejudice and without issuance and service of process for lack of subject-matter jurisdiction. (DE 29.) C. Legal Standard To be actionable, objections to the Report and Recommendation must be specific. Failure to file specific objections constitutes a waiver of a party’s right to further judicial review, including appellate review, if the recommendation is accepted by the district judge.

See *United States v. Schronce*, 727 F.2d 91, 94 & n.4 (4th Cir. 1984). “The Supreme Court has expressly upheld the validity of such a waiver rule, explaining that ‘the filing of objections to a magistrate’s report enables the district judge to focus attention on those issues—factual and legal—that are at the heart of the parties’ dispute.’” *Diamond v. Colonial Life & Accident Ins.*

Co., 416 F.3d 310, 315 (4th Cir. 2005) (citing *Thomas v. Arn*, 474 U.S. 140, 147 (1985) (emphasis added)). In the absence of specific objections to the Report and Recommendation of the magistrate judge, this Court is not required to give any explanation for adopting the recommendation. See *Camby v. Davis*, 718 F.2d 198, 199 (4th Cir. 1983). D. Absence of Objections The Report advised the parties of their right to file specific written objections within the time provided by law.

See 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72(b). No objections have been filed, and the time for doing so has expired. In the absence of objections, the Court is not required to conduct a de novo

review and need only satisfy itself that there is no clear error on the face of the record. Upon review, the Court finds none. E. Conclusion Accordingly, after a thorough review of the Report and Recommendation and the record in this case, the Court finds no clear error.

The Court, therefore, adopts the Report (DE 29) in its entirety and incorporates it herein by reference. It is, therefore, ORDERED that this action is DISMISSED WITHOUT PREJUDICE and without issuance and service of process. IT IS SO ORDERED. Cesep i basen Joseph Dawson, III United States District Judge Florence, South Carolina May 5, 2026 NOTICE OF RIGHT TO APPEAL The parties are hereby notified of the right to appeal this order within thirty (30) days from this date under Rules 3 and 4 of the Federal Rules of Appellate Procedure.