

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Wilfred L. Anderson, M.D. v. State of Ohio, et al.

No. 2:25-cv-1325, United States District Court for the Southern District of Ohio, Eastern Division (December 8, 2025)

SUMMARY

In this Order and Report and Recommendation, the United States District Court for the Southern District of Ohio grants the pro se plaintiff leave to proceed in forma pauperis and permits limited electronic filing. The magistrate judge recommends dismissal for lack of subject-matter jurisdiction, concluding that sovereign immunity bars the claims against the State of Ohio and the Ohio State Medical Board and that the Rooker-Feldman doctrine independently precludes review of the state-court conviction.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Chelsey M. Vascura
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	December 8, 2025
DOCKET	2:25-cv-1325
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff filed a civil-rights action under 42 U.S.C. § 1983 and moved to proceed in forma pauperis. The magistrate judge granted the in forma pauperis and electronic-filing motions and, following screening under 28 U.S.C. § 1915(e)(2), recommended dismissal for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), an in forma pauperis complaint must be screened and dismissed if it is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. A federal court may also dismiss for lack of subject-matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3). Any properly filed objections to the Report and Recommendation receive de novo review under 28 U.S.C. § 636(b)(1).

PRECEDENTIAL VALUE	unknown
PARTIES	Wilfred L. Anderson, M.D. v. State of Ohio, Ohio State Medical Board

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QUESTIONS PRESENTED

1. Whether the State of Ohio and the Ohio State Medical Board are immune from Anderson's § 1983 claims for declaratory and injunctive relief under the Eleventh Amendment.
2. Whether any exception to sovereign immunity, including waiver, congressional abrogation, or the Ex parte Young exception, permits Anderson's claims to proceed.
3. Whether the Rooker-Feldman doctrine deprives the federal district court of subject-matter jurisdiction because Anderson's alleged injury arose from a prior state-court judgment.
4. Whether the alleged fraud or misconduct invoked an exception to Rooker-Feldman.

HOLDINGS

1. The Eleventh Amendment bars Anderson's claims against the State of Ohio and the Ohio State Medical Board because Ohio and its instrumentality are immune from suit in federal court and no applicable exception was shown.
2. The federal district court lacks subject-matter jurisdiction over Anderson's claims because the alleged injury stems from a state-court conviction and the requested relief would require review and rejection of that state-court judgment.
3. Anderson's allegations of investigator misconduct did not establish the fraud-based exception to Rooker-Feldman because the alleged conflict was disclosed and considered during the state proceedings rather than deceiving the state court into entering the judgment.

KEY QUOTATIONS

“There are three exceptions to sovereign immunity: (1) when the state has waived immunity by consenting to the suit, (2) when Congress has expressly abrogated the states’ sovereign immunity, and (3) when the doctrine set forth in Ex Parte Young, 209 U.S. 123, 28 S.Ct. 441, 52 L.Ed. 714 (1908), applies.”

“The Rooker-Feldman doctrine applies to 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.””

“It therefore cannot be said that “the state-court winner deceived the Court into a wrong decree” as required to invoke the Sun Valley Foods exception to the Rooker-Feldman doctrine.”

FACTUAL BACKGROUND

Anderson alleged that he was convicted of a misdemeanor in the Cuyahoga County Court of Common Pleas in 1997 after the applicable two-year statute of limitations had expired. He alleged that the conviction resulted in permanent revocation of his medical license and substantial personal and financial harm. He further alleged that an investigator for the Ohio State Medical Board had an undisclosed conflict of interest, but acknowledged that the conflict was later disclosed, was considered in the administrative and state-court proceedings, and did not lead the state court to overturn the conviction.

PROCEDURAL HISTORY

Anderson alleged that a 1997 Ohio misdemeanor conviction was void ab initio and sought declaratory and injunctive relief against the State of Ohio and the Ohio State Medical Board. The matter was referred to Magistrate Judge Chelsey M. Vascura for initial screening. The magistrate judge granted leave to proceed in forma pauperis and electronic-filing access, then issued an Order and Report and Recommendation recommending dismissal under § 1915(e)(2)(B); the text does not indicate whether the district judge adopted the recommendation.

DISPOSITION

other

CASES CITED

- Yeschick v. Mineta, 675 F.3d 622, 630 (6th Cir. 2012)
- Equal Employment Opportunity Commission v. Indi's Fast Food Restaurant, Inc., No. 3:15-cv-00590, 2016 WL 7473130, at *6 (W.D. Ky. Dec. 28, 2016)
- Williams v. Cincy Urban Apartments, No. 1:10-cv-153, 2010 WL 883846, at *2 n.1 (S.D. Ohio Mar. 9, 2010)
- Carlock v. Williams, 182 F.3d 916, 1999 WL 454880, at *2 (6th Cir. June 22, 1999) (table)
- Pennhurst State School & Hospital v. Halderman, 465 U.S. 89, 100 (1983)
- Lawson v. Shelby County, 211 F.3d 331, 334 (6th Cir. 2000)
- Boler v. Earley, 865 F.3d 391, 410, 412 (6th Cir. 2017)
- Mixon v. State of Ohio, 193 F.3d 389, 397 (6th Cir. 1999)
- Will v. Michigan Department of State Police, 491 U.S. 58, 66 (1989)
- Ex parte Young, 209 U.S. 123 (1908)
- Rooker v. Fidelity Trust Co., 263 U.S. 413, 415-16 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462, 476 (1983)
- In re Cook, 551 F.3d 542, 548 (6th Cir. 2009)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)

- In re Sun Valley Foods Co., 801 F.2d 186, 189 (6th Cir. 1986)
- Resolute Insurance Co. v. North Carolina, 397 F.2d 586, 589 (4th Cir. 1968)
- International Christian Music Ministry Inc. v. Ocwen Federal Bank, FSB, 289 F. App'x 63, 65 (6th Cir. 2008)
- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. Walters, 638 F.2d 947 (6th Cir. 1981)

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