

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Evans v. Brandt

Evans · No. Civil Action No. 1:26-cv-01772 (UNA) · Decided June 16, 2026

SUMMARY

The United States District Court for the District of Columbia grants the plaintiff's application to proceed in forma pauperis and dismisses the complaint without prejudice. The court holds that the defendant, a Superior Court judge, is entitled to absolute judicial immunity for actions taken in a judicial capacity, including alleged erroneous or malicious conduct absent a complete absence of jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Tanya S. Chutkan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 16, 2026
DOCKET	Civil Action No. 1:26-cv-01772 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a complaint and an application to proceed in forma pauperis. The district court granted the in forma pauperis application and dismissed the complaint and action without prejudice upon review.
STANDARD OF REVIEW	The court reviewed the complaint and in forma pauperis application to determine whether the action could proceed.
PRECEDENTIAL VALUE	published
PARTIES	Joseph Miller Evans v. Rainey Brandt

TOPICS

- civil procedure
- government liability
- damages
- remedies

PRACTICE AREAS

- civil procedure
- civil rights
- remedies

QUESTIONS PRESENTED

1. Whether a judge of the Superior Court of the District of Columbia is absolutely immune from a damages action for acts taken in a judicial capacity.
2. Whether the complaint should be dismissed without prejudice based on judicial immunity.

HOLDINGS

1. Judges are absolutely immune from suits for money damages for actions taken in their judicial capacity, unless the actions were taken in the complete absence of all jurisdiction.
2. The complaint and case were dismissed without prejudice because the defendant was protected by judicial immunity.

KEY QUOTATIONS

“Judges are absolutely immune for “all actions taken in the judge’s judicial capacity, unless these actions are taken in the complete absence of all jurisdiction.””

“Further, “a judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority.””

FACTUAL BACKGROUND

Plaintiff alleged that in 2012 the defendant unlawfully confined him at the D.C. Jail based on false charges of sexual assault and possession of a weapon. He further alleged that he was held for five years without a trial and sought \$5 million in damages.

PROCEDURAL HISTORY

Evans sued Brandt, a judge of the Superior Court of the District of Columbia, seeking \$5 million in damages for alleged confinement and prosecution-related conduct. The District Court for the District of Columbia granted leave to proceed in forma pauperis and dismissed the case without prejudice on judicial-immunity grounds.

DISPOSITION

dismissed

CASES CITED

- Mireles v. Waco, 502 U.S. 9, 11 (1991)
- Sindram v. Suda, 986 F.2d 1459, 1460 (D.C. Cir. 1993)
- Caldwell v. Kagan, 865 F. Supp. 2d 35, 42 (D.D.C. 2012)
- Stump v. Sparkman, 435 U.S. 349, 356 (1978)
- Mireles v. Waco, 502 U.S. 9, 9 (1991)
- Mireles v. Waco, 502 U.S. 9, 11 (1991)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA JOSEPH MILLER EVANS,)) Plaintiff,)) v.) Civil Action No. 1:26-cv-01772 (UNA)) RAINEY BRANDT,)) Defendant.) MEMORANDUM OPINION Plaintiff, proceeding pro se, has filed a Complaint (“Compl.”), ECF No. 1, and an Application for Leave to Proceed in forma pauperis (“IFP”), ECF No. 2. Upon review, the IFP Application is granted, and for the reasons explained below, and the Complaint and this case are dismissed without prejudice.

Plaintiff, a resident of the District of Columbia, sues a Judge of the Superior Court of the District of Columbia. See Compl. at 1–2. He alleges that, in 2012, Defendant “unlawfully confined” him at the D.C. Jail, based on false charges of sexual assault and possession of a weapon, and that he was unlawfully held for five years without a trial. See id. at 3–4.

He demands \$5 million in damages. See id. at 4. Applicable here, a court is immune from suit for actions taken in the performance of its duties. *Mireles v. Waco*, 502 U.S. 9, 11 (1991). Judges are absolutely immune for “all actions taken in the judge's judicial capacity, unless these actions are taken in the complete absence of all jurisdiction.” *Sindram v. Suda*, 986 F.2d 1459, 1460 (D.C.

Cir. 1993); see also *Mireles v. Waco*, 502 U.S. 9, 9 (1991) (acknowledging that a long line of Supreme Court precedents have found that a “judge is immune from a suit for money damages”); *Caldwell v. Kagan*, 865 F. Supp. 2d 35, 42 (D.D.C. 2012) (“Judges have absolute immunity for any actions taken in a judicial or quasi-judicial capacity.”). “The scope of the judge’s jurisdiction must be construed broadly where the issue is the immunity of the judge.” *Stump v. Sparkman*, 435 U.S. 349, 356 (1978).

Further, “a judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority.” Id.; see also *Mireles*, 502 U.S. at 11 (“[J]udicial immunity is not overcome by allegations of bad faith or malice.”).

Accordingly, this case is dismissed without prejudice. A separate Order accompanies this Memorandum Opinion. Date: June 16, 2026 Tanya S. Chutkan TANYA S. CHUTKAN United States District Judge