

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

Douglas v. Child Support Enforcement Division

Douglas · No. 3:25-cv-00238-SLG · Decided January 28, 2026

SUMMARY

The United States District Court for the District of Alaska dismissed Brandon Eugene Douglass’s prisoner civil-rights complaint against the Alaska Child Support Enforcement Division upon screening. The court held that the claims, which sought to challenge paternity and obtain reimbursement of child support payments and punitive damages, implicated domestic-relations matters outside federal jurisdiction; dismissal was without prejudice and without leave to amend.

CASE DETAILS

|                       |                                                                                                                                                                 |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Alaska                                                                                                         |
| WRITING FOR THE COURT | Sharon L. Gleason                                                                                                                                               |
| JURISDICTION          | United States District Court for the District of Alaska                                                                                                         |
| DECIDED               | January 28, 2026                                                                                                                                                |
| DOCKET                | 3:25-cv-00238-SLG                                                                                                                                               |
| DISPOSITION           | dismissed                                                                                                                                                       |
| PROCEDURAL POSTURE    | Pro se prisoner civil-rights complaint screened under the Prison Litigation Reform Act and dismissed without prejudice for lack of subject-matter jurisdiction. |
| STANDARD OF REVIEW    | De novo consideration of subject-matter jurisdiction; statutory screening under 28 U.S.C. §§ 1915(e) and 1915A.                                                 |
| PRECEDENTIAL VALUE    | Unpublished district court order; persuasive value only.                                                                                                        |
| PARTIES               | Brandon Eugene Douglas v. Child Support Enforcement Division                                                                                                    |

TOPICS

- subject matter jurisdiction
- family law
- child support
- paternity
- civil procedure

PRACTICE AREAS

- civil procedure
- family law
- constitutional law
- administrative law

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction over claims requiring adjudication of paternity and reimbursement of child-support payments.
2. Whether styling the claims as constitutional due-process violations permitted federal adjudication of the underlying domestic-relations dispute.
3. Whether amendment should be permitted after screening.

## HOLDINGS

1. The federal court must decline jurisdiction over claims whose resolution would require adjudicating paternity, parent-child status, or child-support matters governed by state domestic-relations law.
2. A plaintiff cannot create federal jurisdiction by styling a dispute over paternity and child-support payments as a constitutional due-process claim when the substance of the action remains a domestic-relations dispute.
3. Leave to amend was properly denied because the jurisdictional defect could not be cured by additional factual allegations.

## KEY QUOTATIONS

*“The Court must decline jurisdiction to consider Plaintiff’s claims regarding paternity or his child custody payments because they are exclusively matters of state law.”* (Discussion)

*“The fact that Plaintiff styles his claims as violations of his constitutional due process rights does not change the analysis—at its core, this case seeks to challenge the State’s determination of Plaintiff’s status as the biological parent of a child.”* (Discussion)

*“Because this jurisdictional deficiency cannot be cured by amendment, this case must be DISMISSED without leave to amend in federal court.”* (Discussion)

## FACTUAL BACKGROUND

Brandon Eugene Douglas alleged that, since January 1, 2021, he had paid child support for a child who was not his biological child. He claimed that he requested a paternity test from the Alaska Child Support Enforcement Division, but the agency did not respond and continued garnishing his prison wages. He sought an order requiring DNA testing, reimbursement of garnished support payments, and punitive damages. The court noted that Douglas had previously filed a state-court action to disestablish paternity, which was dismissed for failure to serve the defendant.

## PROCEDURAL HISTORY

Plaintiff filed a federal complaint alleging that the Alaska Child Support Enforcement Division continued garnishing his prison wages for support of a child he claims is not biologically his. The court screened the complaint under 28 U.S.C. §§ 1915(e) and 1915A, determined that the claims required adjudication of paternity and child-support matters outside federal jurisdiction, and dismissed the action without leave to amend. The court also denied pending motions as moot and directed the Clerk to enter final judgment and close the case.

## DISPOSITION

dismissed

## CASES CITED

- United States ex rel. Robinson Rancheria Citizens Council v. Borneo, Inc., 971 F.2d 244, 248 (9th Cir. 1992)
- Cervantes v. Countrywide Home Loans, Inc., 656 F.3d 1034, 1041 (9th Cir. 2011)
- Lopez v. Smith, 203 F.3d at 1127
- Henderson ex rel. Henderson v. Shinseki, 562 U.S. 428, 434 (2011)
- Arbaugh v. Y&H Corp., 546 U.S. 500, 514 (2006)
- Wilson v. Lynch, 835 F.3d 1083, 1091 (9th Cir. 2016)
- Spokeo, Inc. v. Robins, 578 U.S. 330, 337 (2016), as revised (May 24, 2016)
- Vickie Lynn Marshall v. E. Pierce Marshall, Marshall v. Marshall, 547 U.S. 293, 308 (2006)
- Ankenbrandt v. Richards, 504 U.S. 689, 702-704 (1992)
- Buechold v. Ortiz, 401 F.2d 371, 372 (9th Cir. 1968)
- Thompson v. Thompson, 798 F.2d 1547, 1558 (9th Cir. 1986)
- Coats v. Woods, 819 F.2d 236, 237 (9th Cir. 1987)