

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, FORT WAYNE DIVISION

Jonathon Douglas Mattix v. Allen County Sherriff Dept.

Mattix · No. 1:25-CV-489-HAB-ALT · Decided December 4, 2025

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Jonathon Douglas Mattix’s prisoner complaint seeking suppression of evidence in his pending or recently adjudicated Indiana criminal case. The court held that abstention principles and 28 U.S.C. § 1915A barred the requested relief because the federal action sought interference with state criminal proceedings and was frivolous.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Holly A. Brady
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	December 4, 2025
DOCKET	1:25-CV-489-HAB-ALT
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner filed a civil complaint seeking suppression of evidence in a pending Indiana state criminal case. The federal district court screened the complaint under 28 U.S.C. § 1915A and dismissed it.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A to determine whether a prisoner complaint is frivolous, malicious, fails to state a claim, or seeks relief from an immune defendant.
PRECEDENTIAL VALUE	Unpublished district court opinion; precedential status not stated in the opinion.
PARTIES	Jonathon Douglas Mattix v. Allen County Sherriff Dept.

TOPICS

suppression of evidence

criminal procedure

federalism

civil procedure

PRACTICE AREAS

prisoner civil rights

federal courts

criminal procedure

constitutional law

QUESTIONS PRESENTED

1. Whether a federal court may grant a state criminal defendant's request to suppress evidence for use in an ongoing or unresolved state criminal prosecution.
2. Whether the complaint was frivolous and subject to dismissal under 28 U.S.C. § 1915A.

HOLDINGS

1. A federal court must abstain from interfering with state criminal proceedings when the plaintiff seeks a favorable federal constitutional ruling that could affirmatively shape or change the direction of those proceedings.
2. A prisoner complaint seeking unavailable relief and asking a federal court to suppress evidence in a state criminal trial may be dismissed as frivolous under 28 U.S.C. § 1915A.

KEY QUOTATIONS

“When a plaintiff seeks ‘to receive a favorable federal constitutional ruling that can be used affirmatively or offensively to shape—or perhaps change—the direction and course of the state court proceedings,’ the federal court must abstain.” (Opinion and Order)

“For these reasons, this case is DISMISSED under 28 U.S.C. § 1915A because it was frivolous to ask this court to suppress evidence in a State criminal trial.” (Opinion and Order)

FACTUAL BACKGROUND

Jonathon Douglas Mattix, an incarcerated pro se plaintiff, sought federal relief to suppress the date of his arrest and the serial number of a .38 Special revolver in his Indiana murder case. He had been charged, tried, convicted, and sentenced for murder in Indiana state court. The federal court concluded that the requested relief would improperly interfere with the state criminal proceedings and was unavailable even when the complaint was filed.

PROCEDURAL HISTORY

Mattix was charged, tried, convicted, and sentenced for murder in Indiana state court. While those state criminal proceedings were ongoing or unresolved for purposes of the requested relief, he filed this federal action seeking suppression of the date of his arrest and the serial number of a revolver. The district court dismissed the complaint under 28 U.S.C. § 1915A as frivolous because the requested relief was unavailable and federal abstention principles barred interference with the state proceedings.

DISPOSITION

dismissed

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Martin v. Raoul, No. 24-1915, 2025 WL 2528501, at *2 (7th Cir. Sept. 3, 2025)
- J.B. v. Woodard, 997 F.3d 714, 723 (7th Cir. 2021)

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