

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Stanley Aristilde v. John Capobianco, et al.

Aristilde · No. No. 5:26-cv-0166 · Decided January 23, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania grants Stanley Aristilde leave to proceed in forma pauperis but dismisses his civil rights complaint arising from traffic citations, a driver's-license suspension, and related state proceedings. The court concludes that the claims are barred or deficient based on sovereign immunity, judicial immunity, failure to exhaust available state procedures, frivolous right-to-travel theories, and failure to plead a plausible Fourth Amendment violation; amendment is deemed futile.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Joseph F. Leeson, Jr.
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	January 23, 2026
DOCKET	No. 5:26-cv-0166
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff brought a civil-rights action under 42 U.S.C. § 1983, sought leave to proceed in forma pauperis, and challenged traffic citations, suspension of his driver's license, and related governmental conduct. The district court granted in forma pauperis status and screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissing it as frivolous or for failure to state a claim.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis complaint that is frivolous or fails to state a claim. Failure to state a claim is evaluated under the Federal Rule of Civil Procedure 12(b)(6) plausibility standard. The court accepts well-pleaded factual allegations as true, draws reasonable inferences for the pro se plaintiff, construes the allegations liberally, and disregards conclusory allegations.
PRECEDENTIAL VALUE	unknown

PARTIES

Stanley Aristilde v. John Capobianco, Kyle C. Stout, Renee D. Font,
Pennsylvania Department of Transportation, Central Communication
Office

TOPICS

motions to dismiss

civil procedure

section 1983

sovereign immunity

due process

PRACTICE AREAS

civil procedure

civil rights

constitutional law

government liability

remedies

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible claim under 42 U.S.C. § 1983 against the Pennsylvania Department of Transportation.
2. Whether the complaint stated a due process claim based on suspension of Aristilde's driver's license when he did not pursue available state appellate or post-deprivation remedies.
3. Whether absolute judicial immunity barred claims against the magisterial district judge based on rulings in the traffic cases.
4. Whether the alleged traffic citations and license suspension infringed a constitutional right to interstate travel.
5. Whether the complaint stated a Fourth Amendment claim based on an allegedly unlawful traffic stop.

HOLDINGS

1. The Pennsylvania Department of Transportation is a state agency that is not a person subject to liability under § 1983 and is protected by Eleventh Amendment immunity absent waiver; the claims against it were dismissed.
2. The complaint failed to state a due process claim based on suspension of Aristilde's driver's license because he did not use the available state appellate and post-deprivation processes.
3. Absolute judicial immunity barred Aristilde's civil-rights claims against Judge Capobianco because the challenged rulings were judicial acts performed within the judge's jurisdiction.
4. The complaint failed to state a right-to-travel claim and the claim was frivolous because the allegations concerned regulation of Pennsylvania roads and did not implicate interstate travel.
5. The complaint failed to state a Fourth Amendment claim because it did not describe the circumstances of the traffic stops or allege facts permitting an inference that the stops were unreasonable.

KEY QUOTATIONS

“A complaint is subject to dismissal under Section 1915(e)(2)(B)(i) as frivolous if it “lacks an arguable basis either in law or in fact.”” (at 3)

“To state a claim under § 1983, a plaintiff must allege the violation of a right secured by the Constitution and laws of the United States, and must show that the alleged deprivation was committed by a person acting under color of state law.” (at 3)

“The United States Supreme Court has explained that the right to travel “protects the right of a citizen of one State to enter and to leave another State, the right to be treated as a welcome visitor rather than an unfriendly alien when temporarily present in the second State, and, for those travelers who elect to become permanent residents, the right to be treated like other citizens of that State.”” (at 7)

“The Fourth Amendment guarantees “[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures.”” (at 8)

FACTUAL BACKGROUND

Aristilde received two traffic citations in Northampton County: one for operating a vehicle without a valid inspection and another for driving without a license. He was convicted of both offenses by Magisterial District Judge John C. Capobianco and did not appeal either conviction. Pennsylvania suspended his driver's license after he failed to respond to the first citation, and Aristilde sued the officers, judge, and Pennsylvania Department of Transportation, alleging civil-rights violations, an infringement of the right to travel, an unlawful bill of attainder, and an unlawful traffic stop.

PROCEDURAL HISTORY

Aristilde filed the complaint in the Eastern District of Pennsylvania against Pennsylvania Department of Transportation personnel or entities, a magisterial district judge, and two police officers. The court granted leave to proceed in forma pauperis, considered the complaint and attached exhibits, and dismissed the complaint after screening. The court also denied pending motions seeking assorted relief, including restoration of driving privileges, and concluded that amendment would be futile.

DISPOSITION

dismissed

CASES CITED

- Aristilde v. Doe, No. 25-2035, 2025 WL 3471704, at *2 (3d Cir. Dec. 3, 2025) (per curiam)
- Buck v. Hampton Twp. Sch. Dist., 452 F.3d 256, 260 (3d Cir. 2006)
- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Deutsch v. United States, 67 F.3d 1080, 1085 (3d Cir. 1995)
- Denton v. Hernandez, 504 U.S. 25, 33 (1992)
- Tourscher v. McCullough, 184 F.3d 236, 240 (3d Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Talley v. Wetzel, 15 F.4th 275, 286 n.7 (3d Cir. 2021)
- Shorter v. United States, 12 F.4th 366, 374 (3d Cir. 2021)

- Fisher v. Hollingsworth, 115 F.4th 197 (3d Cir. 2024)
- Martinez v. UPMC Susquehanna, 986 F.3d 261, 266 (3d Cir. 2021)
- Vogt v. Wetzel, 8 F.4th 182, 185 (3d Cir. 2021)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 244–45 (3d Cir. 2013)
- Doe v. Allegheny Cnty. Hous. Auth., No. 23-1105, 2024 WL 379959, at *3 (3d Cir. Feb. 1, 2024) (per curiam)
- Cent. Bank of Dover, N.A. v. First Interstate Bank of Denver, N.A., 511 U.S. 164, 190 (1994)
- Colon-Montanez v. Pa. Health. Serv. Staffs, 530 F. App'x 115, 118 (3d Cir. 2013) (per curiam)
- Campbell v. LVNV Funding, LLC and Resurgent Cap. Servs., No. 21-5388, 2022 WL 6172286, at *7 n.10 (E.D. Pa. Oct. 7, 2022)
- Laborers' Int'l Union of N. Am., AFL-CIO v. Foster Wheeler Energy Corp., 26 F.3d 375, 398 (3d Cir. 1994), cert. denied, 513 U.S. 946 (1994)
- United States v. Crawford, No. 18-3149, 2022 WL 2712868, at *1 (3d Cir. July 13, 2022)
- United States v. Schneider, 910 F.2d 1569, 1570 (7th Cir. 1990)
- United States v. Benabe, 654 F.3d 753, 767 (7th Cir. 2011)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Nails v. Pa. Dep't of Transp., 414 F. App'x 452, 455 (3d Cir.)
- Doheny v. Pennsylvania, 781 F. App'x 106, 113 (3d Cir. 2019)
- Mendoza v. Meisel, 270 F. App'x 105, 107 (3d Cir. 2008) (per curiam)
- Stump v. Sparkman, 435 U.S. 349, 355–56 (1978)
- Azubuko v. Royal, 443 F.3d 302, 303–04 (3d Cir. 2006) (per curiam)
- Gallas v. Supreme Ct. of Pa., 211 F.3d 760, 768 (3d Cir. 2000)
- Figueroa v. Blackburn, 208 F.3d 435, 443–44 (3d Cir. 2000)
- Barnes v. Winchell, 105 F.3d 1111, 1122 (6th Cir. 1997)
- Saenz v. Roe, 526 U.S. 489, 500 (1999)
- Knox v. Pcobasco, No. 86-2367, 1986 WL 6310, at *1 (E.D. Pa. June 4, 1986)
- United States v. Guest, 383 U.S. 745, 759 n.17 (1966)
- Carroll v. City of Phila., No. 87-0592, 1989 WL 114721, at *4 (E.D. Pa. Sept. 29, 1989), aff'd, 908 F.2d 961 (3d Cir. 1990)
- Aikens v. New Castle Cnty. Police Dep't, No. 21-350, 2021 WL 5051145, at *4 (D. Del. Nov. 1, 2021)
- Holley v. Dep't of Veteran Affairs, 165 F.3d 244, 248 (3d Cir. 1999)
- Whren v. United States, 517 U.S. 806, 809–10 (1996)
- United States v. Green, 897 F.3d 173, 178 (3d Cir. 2018)
- Navarette v. California, 572 U.S. 393 (2014)
- United States v. Delfin-Colina, 464 F.3d 392, 396–97 (3d Cir.)
- United States v. Moorefield, 111 F.3d 10, 12 (3d Cir. 1997)
- United States v. Yusuf, 993 F.3d 167, 183 n.13 (3d Cir. 2021)
- United States v. Mosley, 454 F.3d 249, 252 (3d Cir. 2006)

- United States v. Wilson, 960 F.3d 136, 145 (3d Cir. 2020)

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