

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

Harold D. Young v. City of Logan, et al.

No. 2:25-cv-698, United States District Court for the Southern District of Ohio, Eastern Division (February 6, 2026)

SUMMARY

The United States District Court for the Southern District of Ohio adopts a magistrate judge’s Report and Recommendation in Harold D. Young’s pro se action concerning the alleged seizure and transfer of checks by a Logan police officer. The court allows Young’s individual-capacity Fourth Amendment unreasonable-seizure claim against Officer Kyle Arnett to proceed, dismisses the remaining claims without prejudice, denies Young’s request for a temporary restraining order and preliminary injunction, and overrules objections concerning nondispositive motions. The court also denies two motions to amend but grants Young thirty days to seek leave to file a new amended complaint.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Douglas R. Cole
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	February 6, 2026
DOCKET	2:25-cv-698
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation under Federal Rule of Civil Procedure 72(b)(3), considered objections to the R&R de novo, reviewed objections to non-dispositive rulings under the clearly erroneous or contrary to law standard, and ruled on outstanding motions to amend and for a status conference.
STANDARD OF REVIEW	The court reviewed properly objected-to portions of the R&R de novo under Federal Rule of Civil Procedure 72(b)(3). It reviewed objections to non-dispositive matters under the clearly erroneous or contrary to law standard under Federal Rule of Civil Procedure 72(a) and 28 U.S.C. § 636(b)(1)(A).

PRECEDENTIAL VALUE	unknown
PARTIES	Harold D. Young v. City of Logan, et al.

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QUESTIONS PRESENTED

1. Whether Young plausibly alleged a 42 U.S.C. § 1983 claim against the City of Logan under Monell.
2. Whether Young plausibly alleged procedural or substantive due process violations based on the alleged seizure and dissemination of his checks.
3. Whether Young stated actionable Ohio statutory or tort claims.
4. Whether Young was entitled to a temporary restraining order or preliminary injunction based on alleged retaliation and potential evidence destruction.
5. Whether the magistrate judge's rulings on preservation of body-camera footage and pro se electronic filing rights were clearly erroneous or contrary to law.
6. Whether Young should be permitted to amend his complaint.

HOLDINGS

1. Young failed to plausibly allege that a City of Logan policy or custom caused the alleged constitutional violation. His § 1983 claims against the City and corresponding official-capacity claims against Officer Arnett were dismissed without prejudice.
2. Young failed to state a procedural due process claim because he did not show that Ohio lacked adequate post-deprivation remedies.
3. Young failed to state a substantive due process claim because the alleged conduct did not shock the conscience and financial-record privacy is not a fundamental right recognized by the Supreme Court or Sixth Circuit.
4. Young's Fourth Amendment unreasonable-seizure claim against Officer Kyle Arnett in his individual capacity could proceed.
5. Young failed to state actionable claims under Ohio Revised Code § 1349.19 or for negligence, conversion, invasion of privacy, or negligent infliction of emotional distress.
6. Young was not entitled to a TRO or preliminary injunction because the requested relief concerned alleged retaliation not pleaded in the complaint and he failed to show a likelihood of success on the merits or irreparable harm.

7. The magistrate judge's denial of Young's motion to preserve body-camera footage and motion for pro se electronic filing rights was neither clearly erroneous nor contrary to law.

KEY QUOTATIONS

“The Court therefore DISMISSES all claims except Young’s Fourth Amendment unreasonable seizure claim against Defendant Officer Kyle Arnett in his individual capacity WITHOUT PREJUDICE.”

“The Court finds that Young cleared the first hurdle to obtain district court review—he offers sufficiently specific objections to the R&R.”

“The only factual support he initially provided is his assertion that body-worn camera footage “is subject to automatic deletion under Ohio law and internal police policies.””

FACTUAL BACKGROUND

Young alleged that, during a police response to a trespass complaint, he retrieved checks from his home after stating that they belonged to him. He claimed that an officer took the checks and placed them in his pocket without explanation, and that he later saw the checks in the possession of Jeramy Huckleberry. Young also alleged subsequent retaliation, including code-enforcement activity, scrutiny of his residence, and marked police vehicles near his home, and sought emergency injunctive relief.

PROCEDURAL HISTORY

Young, proceeding pro se and in forma pauperis, alleged claims under 42 U.S.C. § 1983 and Ohio law arising from an officer's alleged seizure and transfer of his checks. The magistrate judge recommended allowing an individual-capacity Fourth Amendment unreasonable-seizure claim against Officer Kyle Arnett to proceed, dismissing the remaining claims, and denying Young's request for a temporary restraining order and preliminary injunction. The district court adopted the R&R, overruled Young's objections, dismissed all claims except the unreasonable-seizure claim without prejudice, denied the requested injunctive relief, denied two motions to amend, and granted thirty-one days to seek leave to file a new amended complaint.

DISPOSITION

other

CASES CITED

- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Baker v. Lind, No. 1:23-CV-321, 2023 WL 3791646 (S.D. Ohio June 2, 2023), report and recommendation adopted, 2023 WL 6161550 (S.D. Ohio Sept. 21, 2023)
- McNeilly v. Land, 684 F.3d 611 (6th Cir. 2012)
- Hairston v. Sparks, No. 1:22-cv-104, 2022 WL 22854896 (S.D. Ohio Nov. 22, 2022)
- Jones v. City of Monroe, 341 F.3d 474 (6th Cir. 2003)
- Lewis v. Humboldt Acquisition Corp., 681 F.3d 312 (6th Cir. 2012) (en banc)

- Parratt v. Taylor, 451 U.S. 527 (1981)
- Moore v. Wesbanco Bank, Inc., No. 2:10-cv-514, 2013 WL 11821469 (S.D. Ohio Nov. 12, 2013), aff'd, 612 F. App'x 816 (6th Cir. 2015)
- Bates v. Ohio Department of Rehabilitation and Correction, No. 1:22-cv-337, 2023 WL 4348835 (S.D. Ohio July 5, 2023)
- Miller v. Currie, 50 F.3d 373 (6th Cir. 1995)
- Sims v. Moss, No. 3:24-cv-1052, 2025 U.S. Dist. LEXIS 220803 (M.D. Tenn. June 18, 2025)
- Simms v. Warden, No. 2:22-cv-474, 2024 WL 4783911 (S.D. Ohio Nov. 14, 2024)
- Bonasera v. Pennsylvania National Mutual Casualty Insurance Co., No. 2:19-cv-3817, 2021 WL 1785618 (S.D. Ohio May 5, 2021)
- Needham v. Butler County Jail, No. 1:19-cv-294, 2019 WL 5883643 (S.D. Ohio Nov. 12, 2019)

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