

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Johnathan McFarland v. Hon. John F. Newsham

McFarland · No. 4:25-cv-1687-CMS · Decided March 4, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri granted Johnathan McFarland leave to proceed in forma pauperis but dismissed his § 1983 action without prejudice. The court concluded that the claims concerning child custody and child support were barred by the domestic-relations exception and the Rooker-Feldman doctrine, and that the state court judge was entitled to absolute judicial immunity. The court also denied emergency injunctive relief as moot and certified that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Cristian M. Stevens
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	March 4, 2026
DOCKET	4:25-cv-1687-CMS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought leave to proceed in forma pauperis and emergency injunctive relief in a 42 U.S.C. § 1983 action against a Missouri state court judge sued in his official capacity. The court granted leave to proceed in forma pauperis, denied emergency injunctive relief as moot, and dismissed the action without prejudice on initial review.
STANDARD OF REVIEW	Initial screening under 28 U.S.C. § 1915(e)(2); the court accepted well-pleaded factual allegations as true, disregarded legal conclusions and conclusory allegations, liberally construed the pro se complaint, and assessed whether it stated a plausible claim for relief and whether subject-matter jurisdiction existed.
PRECEDENTIAL VALUE	Unpublished district-court memorandum and order; precedential status not designated.

PARTIES

Johnathan McFarland v. Hon. John F. Newsham

TOPICS

subject matter jurisdiction

family law

civil rights

injunctions

due process

PRACTICE AREAS

federal civil procedure

family law

civil rights

federal jurisdiction

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction over claims seeking to alter or review state-court child-custody and child-support determinations.
2. Whether the domestic-relations exception and the Rooker-Feldman doctrine barred the federal claims.
3. Whether the state-court judge was entitled to absolute judicial immunity from claims arising from judicial conduct.
4. Whether the complaint should be dismissed on initial review under 28 U.S.C. § 1915(e)(2).

HOLDINGS

1. The federal district court lacked jurisdiction over claims that were inextricably intertwined with state-court determinations concerning child custody and child support; styling the claims as civil-rights claims did not alter their domestic-relations substance.
2. The district court lacked jurisdiction to review or reject the state-court judgment concerning Plaintiff's children because the claims could succeed only if the federal court determined that the state-court decision was wrong.
3. The state-court judge was entitled to absolute judicial immunity because Plaintiff's allegations concerned judicial actions and did not show that the judge acted in the complete absence of jurisdiction.
4. A complaint filed in forma pauperis must be dismissed under 28 U.S.C. § 1915(e)(2) when it is frivolous, malicious, fails to state a plausible claim, or is subject to dismissal for lack of jurisdiction or immunity.

KEY QUOTATIONS

“The federal district court also lacks subject matter jurisdiction to engage in appellate review of state court decisions.” (Discussion § 1)

“Plaintiff’s framing his concerns as civil rights violations does not change the fact that Plaintiff is asking this Court to “enjoin Defendant from enforcing child support obligations...” and order a new hearing in his child custody case.” (Discussion § 1)

“Judges are “entitled to absolute immunity for all judicial actions that are not ‘taken in a complete absence of all jurisdiction.’” (Discussion § 2)

FACTUAL BACKGROUND

Plaintiff alleged that Defendant, a Missouri state court judge, failed to provide an adequate hearing in Plaintiff's child-custody and child-support case. Plaintiff claimed that he had been denied access to his children through the state-court proceedings and objected to being required to pay child support despite lacking contact with the children. He framed the claims under 42 U.S.C. § 1983, the First and Fourteenth Amendments, and Missouri law, seeking to enjoin enforcement of child-support obligations and obtain a new custody hearing.

PROCEDURAL HISTORY

McFarland filed a pro se federal complaint alleging that Judge Newsham failed to provide an adequate hearing in state child-custody and child-support proceedings and seeking declaratory and injunctive relief. The district court reviewed the complaint under 28 U.S.C. § 1915(e)(2), concluded that the claims were barred by the domestic-relations exception and the Rooker-Feldman doctrine, and further concluded that the judge was entitled to absolute judicial immunity. The court dismissed without prejudice and stated that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Barton v. Taber, 820 F.3d 958, 964 (8th Cir. 2016)
- Brown v. Green Tree Servicing LLC, 820 F.3d 371, 372-73 (8th Cir. 2016)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980)
- Stone v. Harry, 364 F.3d 912, 914-15 (8th Cir. 2004)
- McNeil v. United States, 508 U.S. 106, 113 (1993)
- McAdams v. McCord, 533 F.3d 924, 927 (8th Cir. 2008)
- Kronholm v. Fed. Deposit Ins. Corp., 915 F.2d 1171, 1174 (8th Cir. 1990)
- Sanders v. Clemco Indus., 823 F.2d 214, 216 (8th Cir. 1987)
- Gray v. City of Valley Park, Mo., 567 F.3d 976, 982 (8th Cir. 2009)
- Ankenbrandt v. Richards, 504 U.S. 689, 703-04 (1992)
- Ex parte Burrus, 136 U.S. 586, 593-94 (1890)
- Kahn v. Kahn, 21 F.3d 859, 861 (8th Cir. 1994)
- Firestone v. Cleveland Tr. Co., 654 F.2d 1212, 1215 (6th Cir. 1981)
- Frawley v. Schutt, 2021 WL 5415326, at *6 (E.D. Mo. Feb. 19, 2021)
- Quinn v. Kibodeaux, 2020 WL 6701457, at *1 (D. Idaho Nov. 13, 2020)
- Postma v. First Fed. Sav. & Loan of Sioux City, 74 F.3d 160, 162 (8th Cir. 1996)

- Exxon Mobil Corp. v. Saudi Basic Indus. Corp., 544 U.S. 280, 284 (2005)
- Penn v. United States, 335 F.3d 786, 789 (8th Cir. 2003)
- Mireles v. Waco, 502 U.S. 9, 11-12 (1991)
- Sheppard v. Maxwell, 384 U.S. 333, 358 (1966)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION JOHNATHAN MCFARLAND,)) Plaintiff,)) v.) Case No. 4:25-cv-1687-CMS) HON. JOHN F. NEWSHAM,)) Defendant.) MEMORANDUM AND ORDER This matter comes before the Court on the motion of self-represented plaintiff Johnathan McFarland for leave to commence this civil action without prepayment of the required filing fee.

ECF No. 2. Having reviewed the motion, the Court finds the motion should be granted. See 28 U.S.C. § 1915(a)(1). Additionally, for the reasons discussed below, the Court will dismiss this action without prejudice. Legal Standard on Initial Review Under 28 U.S.C. § 1915(e)(2), the Court is required to dismiss a complaint filed in forma pauperis if it is frivolous, malicious, or fails to state a claim upon which relief can be granted.

To state a claim, a plaintiff must demonstrate a plausible claim for relief, which is more than a “mere possibility of misconduct.” *Ashcroft v. Iqbal*, 556 U.S. 662, 679 (2009). “A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.* at 678.

Determining whether a complaint states a plausible claim for relief is a context-specific task that requires the reviewing court to draw upon judicial experience and common sense. *Id.* at 679. The court must “accept as true the facts alleged, but not legal conclusions or threadbare recitals of the elements of a cause of action, supported by mere conclusory statements.” *Barton v. Taber*, 820 F.3d 958, 964 (8th Cir.

2016). See also *Brown v. Green Tree Servicing LLC*, 820 F.3d 371, 372- 73 (8th Cir. 2016) (stating that court must accept factual allegations in complaint as true, but is not required to “accept as true any legal conclusion couched as a factual allegation”). When reviewing the complaint of a self-represented plaintiff under § 1915(e)(2), the Court must give it the benefit of a liberal construction.

Haines v. Kerner, 404 U.S. 519, 520 (1972). A “liberal construction” means that if the essence of an allegation is discernible, the district court should construe the plaintiff’s complaint in a way that permits his or her claim to be considered within the proper legal framework. *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015).

However, even complaints of self-represented plaintiffs are required to allege facts which, if true, state a claim for relief as a matter of law. *Martin v. Aubuchon*, 623 F.2d 1282, 1286 (8th Cir. 1980). See also *Stone v. Harry*, 364 F.3d 912, 914-15 (8th Cir. 2004) (stating that federal courts are not required to “assume facts that are not alleged, just because an additional factual allegation would have formed a stronger complaint”).

In addition, affording the complaint of a self-represented plaintiff the benefit of a liberal construction does not mean that procedural rules in ordinary civil litigation must be interpreted so as to excuse mistakes by those who proceed without counsel. See *McNeil v. United States*, 508 U.S. 106, 113 (1993).

The Complaint Plaintiff Johnathan McFarland, a self-represented litigant, initiated this action under 42 U.S.C. § 1983 against the Honorable John F. Newsham, a Missouri state court judge, in his official capacity. ECF No. 1. Plaintiff seeks declaratory and injunctive relief, alleging Judge Newsham has failed to provide an adequate hearing in Plaintiff’s child custody and support case.

Id. at 1. Plaintiff alleges violations of the Fourteenth Amendment, First Amendment, and Missouri law. *Id.* Plaintiff alleges that he has been denied access to his children through the state court proceedings before Judge Newsham. *Id.* at 2. He also complains that he is compelled to pay child support, even though he cannot have contact with his children. *Id.* Discussion Having carefully reviewed Plaintiff’s complaint, the Court finds the allegations brought against Defendant are subject to dismissal for the reasons discussed below.

1. Subject Matter Jurisdiction Federal courts are courts of limited jurisdiction. *McAdams v. McCord*, 533 F.3d 924, 927 (8th Cir. 2008). The existence of jurisdiction is a threshold requirement that must be assured in every federal case. *Kronholm v. Fed. Deposit Ins. Corp.*, 915 F.2d 1171, 1174 (8th Cir. 1990); see also *Sanders v. Clemco Indus.*, 823 F.2d 214, 216 (8th Cir.

1987) (“The threshold requirement in every federal case is jurisdiction and we have admonished the district court to be attentive to a satisfaction of jurisdictional requirements in all cases.”). The issue of the existence of jurisdiction may be raised at any time, by any party or by the court. *Gray v. City of Valley Park, Mo.*, 567 F.3d 976, 982 (8th Cir. 2009).

In general, federal courts have no jurisdiction over domestic relations matters. See *Ankenbrandt v. Richards*, 504 U.S. 689, 703 (1992). Rather, state courts have exclusive jurisdiction over these matters. *Id.* at 703-04. “The whole subject of the domestic relations of husband and wife, parent and child, belongs to the laws of the states, and not to the laws of the United States.” *Ex parte Burrus*, 136 U.S. 586, 593-94 (1890); see also *Kahn v. Kahn*, 21 F.3d 859, 861 (8th Cir.

1994) (“The domestic relations exception ... divests the federal courts of jurisdiction over any action for which the subject is a divorce, allowance of alimony, or child custody.”) (internal citations omitted); *Firestone v. Cleveland Tr. Co.*, 654 F.2d 1212, 1215 (6th Cir. 1981) (“Even

when brought under the guise of a federal question action, a suit whose substance is domestic relations generally will not be entertained in a federal court.”).

Here, although Plaintiff drafted his complaint to allege federal civil rights violations, his claims are “inextricably intertwined” with state court determinations of custody rights concerning his minor children. *Id.* Plaintiff’s framing his concerns as civil rights violations does not change the fact that Plaintiff is asking this Court to order a state court judge to “enjoin Defendant from enforcing child support obligations...” and order a new hearing in his child custody case.

ECF No. 1 at 6. “The family law exception to federal jurisdiction applies even when a party is alleging a violation of federal law,” and federal “[c]ourts may not resolve child custody questions... even if there is an allegation of a constitutional violation.” *Frawley v. Schutt*, 2021 WL 5415326 at *6 (E.D. Mo. Feb. 19, 2021)(quoting *Quinn v. Kibodeaux*, 2020 WL 6701457 at *1 (D.

Idaho Nov. 13, 2020)). Because Plaintiffs’ claims are “inextricably intertwined” with the underlying state family law action, the Court will abstain from exercising jurisdiction over his claims. The federal district court also lacks subject matter jurisdiction to engage in appellate review of state court decisions. *Postma v. First Fed. Sav. & Loan of Sioux City*, 74 F.3d 160, 162 (8th Cir.

1996). Federal review of state court decisions may be had only in the United States Supreme Court. *Id.* Any review of a state court decision by this Court would most likely violate the Rooker-Feldman doctrine, which applies to “cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments.” *Exxon Mobil Corp. v. Saudi Basic Indus.*

Corp., 544 U.S. 280, 284 (2005). Plaintiff’s claims here apparently can only succeed if this Court decides that a state-court decision regarding his minor children was wrongly decided. Accordingly, Plaintiff’s claims are inextricably intertwined with the state court judgment and this Court lacks jurisdiction to review them under the Rooker-Feldman doctrine.

See *Postma*, 74 F.3d at 162. 2. Judicial Immunity The sole defendant in this case is a state court judge sued in his official capacity. Judges are “entitled to absolute immunity for all judicial actions that are not ‘taken in a complete absence of all jurisdiction.’” *Penn v. United States*, 335 F.3d 786, 789 (8th Cir. 2003) (quoting *Mireles v. Waco*, 502 U.S. 9, 11-12 (1991)).

A judge acts in his judicial capacity when he exercises control over his courtroom. See *Sheppard v. Maxwell*, 384 U.S. 333, 358 (1966) (observing “the courtroom and courthouse premises are subject to the control of the court”). Plaintiff’s allegations do not show that Defendant acted outside of his jurisdiction, and Defendant is therefore entitled to absolute immunity.

Conclusion For all the aforementioned reasons, dismissal is appropriate here. All other motions before the Court will be denied. Accordingly, IT IS HEREBY ORDERED that Plaintiff's motion for leave to proceed in forma pauperis [ECF No. 2] is GRANTED. IT IS FURTHER ORDERED that Plaintiff's motion for emergency injunctive relief [ECF No. 3] is DENIED as moot. IT IS FURTHER ORDERED that this action is DISMISSED without prejudice.

IT IS FURTHER ORDERED that an appeal from this dismissal would not be taken in good faith. A separate Order of Dismissal shall accompany this Memorandum and Order. Dated this 4th day of March, 2026. fi jf Lf ye ve ☐☐ CRISTIAN M. STEVENS UNITED STATES DISTRICT JUDGE