

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PRECEDENTIAL VALUE	Unpublished district-court memorandum and order; precedential status not designated.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)

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