

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Aaron B. Wright v. Jeff Easter, et al.

Wright · No. 25-3251-JWL · Decided December 23, 2025

SUMMARY

The United States District Court for the District of Kansas dismissed Aaron B. Wright’s pro se 42 U.S.C. § 1983 action for failure to state a claim. The court concluded that Wright’s claims concerning his state criminal proceedings and sentence were barred by Heck v. Humphrey and, to the extent he sought to challenge the validity or duration of his custody, were more appropriately brought in a habeas corpus action.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Kansas                                                                                                                                                                                                                                                                                                                       |
| WRITING FOR THE COURT | John W. Lungstrum                                                                                                                                                                                                                                                                                                                                                             |
| JURISDICTION          | United States District Court for the District of Kansas                                                                                                                                                                                                                                                                                                                       |
| DECIDED               | December 23, 2025                                                                                                                                                                                                                                                                                                                                                             |
| DOCKET                | 25-3251-JWL                                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | Pro se plaintiff brought a civil-rights action under 42 U.S.C. § 1983 seeking compensatory and punitive damages based on alleged constitutional violations arising from state criminal proceedings. After the court issued an order to show cause and permitted amendment, plaintiff filed an amended complaint. The court dismissed the matter for failure to state a claim. |
| STANDARD OF REVIEW    | Screening for failure to state a claim; claims challenging the validity of a conviction or sentence are not cognizable under § 1983 unless the conviction or sentence has been invalidated.                                                                                                                                                                                   |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                                   |
| PARTIES               | Aaron B. Wright v. Jeff Easter, Jeff Zmuda, et al.                                                                                                                                                                                                                                                                                                                            |

TOPICS

- section 1983
- federal habeas corpus
- post-conviction relief
- prisoners rights
- civil rights

## PRACTICE AREAS

civil rights

constitutional law

federal habeas corpus

prisoner litigation

## QUESTIONS PRESENTED

1. Whether plaintiff's claims challenging the validity of his state conviction or sentence were cognizable in a 42 U.S.C. § 1983 action for damages.
2. Whether plaintiff was required to pursue any challenge to the fact or duration of his custody through a federal habeas corpus action rather than a § 1983 action.
3. Whether the amended complaint stated a claim for relief notwithstanding plaintiff's failure to show that the conviction or sentence had been invalidated.

## HOLDINGS

1. A prisoner may not proceed under § 1983 for damages when success on the claim would necessarily imply that the conviction or sentence is invalid, unless the conviction or sentence has already been invalidated.
2. A challenge to the legality of confinement that would result in release or a speedier release must be brought in a habeas corpus proceeding rather than under § 1983.
3. A state prisoner seeking federal habeas relief must exhaust available state-court remedies before presenting the claims to a federal court.

## KEY QUOTATIONS

*"[A] § 1983 action is a proper remedy for a state prisoner who is making a constitutional challenge to the conditions of his prison life, but not to the fact or length of his custody." (411 U.S. at 499)*

*"whether a judgment in favor of the plaintiff would necessarily imply the invalidity of his conviction or sentence; if it would, the complaint must be dismissed unless the plaintiff can demonstrate that the conviction or sentence has already been invalidated." (512 U.S. at 487)*

*"Before a federal court may grant habeas relief to a state prisoner, the prisoner must exhaust his remedies in state court." (526 U.S. at 842)*

## FACTUAL BACKGROUND

Wright was incarcerated at the Douglas County Correctional Facility and alleged that defendants' conduct related to criminal proceedings in Sedgwick and Douglas Counties. He challenged a 2019 arrest and prosecution, alleged an unadjudicated weapons-related charge and inaccurate criminal-history information, and asserted violations of the Fourth, Fifth, and Fourteenth Amendments. He sought monetary damages but did not allege that the relevant conviction or sentence had been overturned, reversed, or otherwise invalidated.

## PROCEDURAL HISTORY

The court previously found plaintiff's allegations difficult to decipher and ordered him to show cause why the action should not be dismissed, while allowing him to file an amended complaint. Plaintiff filed an amended

complaint continuing to challenge his 2019 state criminal proceedings, conviction, sentence, and related criminal-history information. The court concluded that claims necessarily implying the invalidity of the conviction or sentence were barred by *Heck v. Humphrey* and that any challenge to the fact or duration of custody had to be brought in habeas corpus, subject to exhaustion requirements.

## DISPOSITION

dismissed

## CASES CITED

- *Preiser v. Rodriguez*, 411 U.S. 475 (1973)
- *Heck v. Humphrey*, 512 U.S. 477 (1994)
- *Montez v. McKinna*, 208 F.3d 862 (10th Cir. 2000)
- *O'Sullivan v. Boerckel*, 526 U.S. 838 (1999)
- *Woodford v. Ngo*, 548 U.S. 81 (2006)
- *Rose v. Lundy*, 455 U.S. 509 (1982)
- *Smith v. Veterans Administration*, 636 F.3d 1306 (10th Cir. 2011)
- *Miles v. Kansas*, 770 F. App'x 432 (10th Cir. 2019)

## OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS AARON B. WRIGHT, Plaintiff, v. CASE NO. 25-3251-JWL JEFF EASTER, et al., Defendants. MEMORANDUM AND ORDER Plaintiff brings this pro se civil rights case under 42 U.S.C. § 1983. Plaintiff is in custody at the Douglas County Correctional Facility in Lawrence, Kansas.

The Court granted Plaintiff leave to proceed in forma pauperis. On November 26, 2025, the Court entered a Memorandum and Order to Show Cause (Doc. 4) (“MOSC”), ordering Plaintiff to show good cause why his claims should not be dismissed for the reasons set forth in the MOSC.

The Court also granted Plaintiff the opportunity to file an amended complaint to cure the deficiencies. Plaintiff has now filed an Amended Complaint (Doc. 5). The Court’s screening standards are set forth in the MOSC.

I. Nature of the Matter before the Court Plaintiff alleges that he was convicted of two separate counts of attempted murder in Case No. 1996-CR-0190 in the District Court of Douglas County, Kansas. (Doc. 5, at 2.) Plaintiff claims that “[t]here [was] another misdemeanor charge of Unlawful Use of Weapon of which the charge doesn’t exist.” *Id.* Plaintiff alleges that on December 15, 2019, he was arrested for criminal possession of a weapon by a convicted felon and driving under the influence in Case No. 2019- CR-3756 in the District Court of Sedgwick County, Kansas.

Id. Plaintiff alleges that he was incarcerated for a year with no court hearing. Id. Plaintiff alleges that his Unlawful Use of Weapons charge was not mentioned in his “120 reviews while incarcerated” but was “ex post” mentioned in his Criminal History Record Data. Id. As Count I, Plaintiff alleges that his Fourth Amendment rights were violated when there was no probable cause for a search.

Id. at 3. Plaintiff alleges that on December 15, he was pulled over by an off-duty officer while Plaintiff was going to the grocery store. Id. Plaintiff states that prior to this he had been sitting at home. Id. As Count II, Plaintiff alleges that his Fifth Amendment right against self-incrimination was violated when he was compelled to be a witness against himself.

Id. In support, Plaintiff states that his “Criminal History Record claims explosives involved of which none were found causing job opportunity failure.” Id. Plaintiff then states “[p]rofile pull overs, abuse of discretion for others to classify as register offender probable cause for search at random justifiable.” Id. As Count III, Plaintiff claims that his “due process rights were violated when Defendants entertained a crime charged lacking due process of justice in the court of law.” Id. at 4.

Plaintiff claims that the “misdemeanor charge [was] never adjudicated in which to determine if the crime charged exist[ed].” Id. Plaintiff names as defendants: Jeff Easter, Sedgwick County Sheriff; and Jeff Zmuda, Kansas Department of Corrections Secretary of Corrections. Plaintiff alleges that Sheriff Easter charged Plaintiff with criminal possession of a weapon by a convicted felon under K.S.A. § 21- 6304.

Id. at 1. Plaintiff claims that Secretary Jeff Zmuda committed an abuse of process when he recorded frivolous information in his Criminal History Data Record that did not “coincide with General Statute by language or number.” Id. at 2. Plaintiff seeks compensatory and punitive damages. II. DISCUSSION The Court noted in the MOSC that Plaintiff’s claims and allegations in his Complaint were hard to decipher.

Plaintiff’s claims in his Amended Complaint are also hard to decipher. The Court found in the MOSC that to the extent Plaintiff is arguing that the offer of a plea deal violates his right to be free from self-incrimination, such a claim is without merit.

The Court also found that Plaintiff’s claims appear to relate to his state court criminal proceedings in 2019, and to the extent Plaintiff challenges the validity of his sentence in his state criminal case, his federal claim must be presented in habeas corpus. “[A] § 1983 action is a proper remedy for a state prisoner who is making a constitutional challenge to the conditions of his prison life, but not to the fact or length of his custody.” *Preiser v. Rodriguez*, 411 U.S. 475, 499 (1973) (emphasis added).

When the legality of a confinement is challenged so that the remedy would be release or a speedier release, the case must be filed as a habeas corpus proceeding rather than under 42 U.S.C. § 1983, and the plaintiff must comply with the exhaustion of state court remedies requirement. *Heck v. Humphrey*, 512 U.S. 477, 482 (1994); see also *Montez v. McKinna*, 208 F.3d 862, 866 (10th Cir.

2000) (exhaustion of state court remedies is required by prisoner seeking habeas corpus relief); see 28 U.S.C. § 2254(b)(1)(A) (requiring exhaustion of available state court remedies). “Before a federal court may grant habeas relief to a state prisoner, the prisoner must exhaust his remedies in state court.

In other words, the state prisoner must give the state courts an opportunity to act on his claims before he presents those claims to a federal court in a habeas petition.” *O’Sullivan v. Boerckel*, 526 U.S. 838, 842 (1999); see *Woodford v. Ngo*, 548 U.S. 81, 92 (2006); *Rose v. Lundy*, 455 U.S. 509, 518–19 (1982).

Therefore, any claim challenging his state sentence is not cognizable in a § 1983 action. In his Amended Complaint, Plaintiff continues to make claims regarding his 2019 state criminal proceedings and seeks damages. Plaintiff has not alleged that the conviction or sentence has been invalidated.

Before Plaintiff may proceed in a federal civil action for monetary damages based upon an invalid conviction or sentence, he must show that his conviction or sentence has been overturned, reversed, or otherwise called into question. *Heck*, 512 U.S. 477. If Plaintiff has been convicted and a judgment on Plaintiff’s claim in this case would necessarily imply the invalidity of that conviction, the claim may be barred by *Heck*.

In *Heck v. Humphrey*, the United States Supreme Court held that when a state prisoner seeks damages in a § 1983 action, the district court must consider the following: whether a judgment in favor of the plaintiff would necessarily imply the invalidity of his conviction or sentence; if it would, the complaint must be dismissed unless the plaintiff can demonstrate that the conviction or sentence has already been invalidated.

*Id.* at 487. In *Heck*, the Supreme Court held that a § 1983 damages claim that necessarily implicates the validity of the plaintiff’s conviction or sentence is not cognizable unless and until the conviction or sentence is overturned, either on appeal, in a collateral proceeding, or by executive order. *Id.* at 486–87. Plaintiff has failed to show good cause why his claims regarding his 2019 conviction and sentence are not barred by *Heck*.

If Plaintiff is seeking to challenge his sentence or conviction, such a claim must be brought in a habeas action. IT IS THEREFORE ORDERED BY THE COURT that this matter is dismissed for failure to state a claim.<sup>1</sup> 1 A dismissal based on *Heck* is for failure to state a claim. *Smith v.*

Veterans Admin., 636 F.3d 1306, 1312 (10th Cir. 2011); see also *Miles v. Kansas*, 770 F. App'x 432 (10th Cir.

2019) (unpublished). IT IS SO ORDERED. Dated December 23, 2025, in Kansas City, Kansas. S/ John W. Lungstrum JOHN W. LUNGSTRUM UNITED STATES DISTRICT JUDGE