

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Bondoc v. Blake

Bondoc · No. Civil Action No. 25-1416 (SLS) · Decided January 30, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed Shannon A. Bondoc’s claims against James Blake, Jr. for lack of subject-matter jurisdiction. The court applied Younger abstention to claims seeking interference with ongoing Maryland family-court proceedings and the Rooker–Feldman doctrine to claims challenging existing state-court judgments. The court did not reach the defendant’s Rule 12(b)(6) arguments.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Sparkle L. Sooknanan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 30, 2026
DOCKET	Civil Action No. 25-1416 (SLS)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the amended complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court granted the motion under Rule 12(b)(1) for lack of subject-matter jurisdiction and dismissed the action.
STANDARD OF REVIEW	On a Rule 12(b)(1) motion, the plaintiff bears the burden of demonstrating subject-matter jurisdiction. The court liberally construes the complaint and gives the plaintiff the benefit of reasonable inferences; pro se pleadings are construed liberally and held to less stringent standards than lawyer-drafted pleadings.
PRECEDENTIAL VALUE	Published memorandum opinion
PARTIES	Shannon A. Bondoc v. James Blake, Jr.

TOPICS

- subject matter jurisdiction
- family law procedure
- child custody
- child support
- federalism

PRACTICE AREAS

family law

civil procedure

federal jurisdiction

federalism

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction over claims seeking to stay or interfere with ongoing Maryland divorce and child-custody proceedings.
2. Whether the Rooker-Feldman doctrine barred federal district-court review of Maryland child-support, child-custody, and other state-court orders.
3. Whether the court needed to decide the Rule 12(b)(6) motion or the domestic-relations exception after concluding that subject-matter jurisdiction was lacking.

HOLDINGS

1. The court could not exercise jurisdiction over Bondoc's claims seeking to stay or otherwise interfere with ongoing Maryland divorce and child-custody proceedings because the proceedings fell within the category of state proceedings covered by *Younger* and satisfied the requirements of ongoing proceedings, important state interests, and an adequate opportunity to raise federal issues.
2. The Rooker-Feldman doctrine barred Bondoc's claims seeking federal review or invalidation of Maryland child-support, child-custody, and forfeiture orders because those claims complained of injuries caused by state-court judgments and invited the federal district court to review and reject those judgments.
3. Because the court dismissed for lack of subject-matter jurisdiction under *Younger* and *Rooker-Feldman*, it did not need to reach the Rule 12(b)(6) motion or decide whether the domestic-relations exception independently deprived the court of jurisdiction.

KEY QUOTATIONS

“*[F]undamentally, federal courts have no business interfering with child-custody proceedings in state court.*” (at 2)

“*Family relations are a traditional area of state concern.*” (at 4)

“*The Rooker–Feldman doctrine applies to cases “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.”*” (at 5)

FACTUAL BACKGROUND

Bondoc and Blake share a child. Bondoc alleged that she had primary custody until 2012, when a court transferred custody to Blake, and she challenged a \$34,046 child-support judgment and prior custody orders. She also sought to stay ongoing Maryland proceedings and obtain a change in custody or renewed federal visitation protections. The Maryland proceedings included ongoing divorce and child-custody litigation in Charles County.

PROCEDURAL HISTORY

Bondoc filed an action challenging Maryland child-support, child-custody, and related state-court orders and seeking to stay ongoing Maryland family-court proceedings. Blake moved to dismiss for lack of subject-matter jurisdiction and failure to state a claim. The motion was fully briefed; the court dismissed the case under Rule 12(b)(1), denied Bondoc's motion to strike as moot, and did not reach the Rule 12(b)(6) arguments.

DISPOSITION

dismissed

CASES CITED

- Hill v. U.S. Department of the Interior, 699 F. Supp. 3d 1, 12 (D.D.C. 2023)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 561 (1992)
- U.S. Ecology, Inc. v. U.S. Department of the Interior, 231 F.3d 20, 24 (D.C. Cir. 2000)
- Thomas v. Principi, 394 F.3d 970, 972 (D.C. Cir. 2005)
- Barr v. Clinton, 370 F.3d 1196, 1199 (D.C. Cir. 2004)
- Tyson v. Brennan, 277 F. Supp. 3d 28, 35 (D.D.C. 2017)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Younger v. Harris, 401 U.S. 37, 44-45 (1971)
- Sprint Communications, Inc. v. Jacobs, 571 U.S. 69, 78 (2013)
- New Orleans Public Service, Inc. v. Council of the City of New Orleans, 491 U.S. 350, 368 (1989)
- Moore v. Sims, 442 U.S. 415, 435 (1979)
- Nellom v. Ambrose, No. 22-cv-1283, 2022 WL 4120265, at *1-*2 (E.D. Pa. Sept. 9, 2022)
- Smith v. Harrison, No. 21-cv-5120, 2022 WL 445757, at *4 (E.D. Pa. Feb. 14, 2022)
- Hoai v. Sun Refining & Marketing Co., 866 F.2d 1515, 1518 (D.C. Cir. 1989)
- Middlesex County Ethics Committee v. Garden State Bar Association, 457 U.S. 423, 432 (1982)
- Proctor v. Title 4-D, 318 F. Supp. 3d 337, 346 (D.D.C. 2018)
- Whitehead v. D.C. Child Support Services Division, 892 F. Supp. 2d 315, 318 (D.D.C. 2012)
- Delaney v. District of Columbia, 659 F. Supp. 2d 185, 194 (D.D.C. 2009)
- Pennzoil Co. v. Texaco, Inc., 481 U.S. 1, 15 (1987)
- Ankenbrandt v. Richards, 504 U.S. 689, 704 (1992)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)
- Richardson v. District of Columbia Court of Appeals, 83 F.3d 1513, 1514 (D.C. Cir. 1996)
- Hickson v. Newell, No. 24-cv-3576, 2025 WL 315144, at *1 (D.D.C. Jan. 28, 2025)
- Beasley v. Becker, No. 24-cv-2832, 2024 WL 5008723, at *1 (D.D.C. Nov. 27, 2024)
- Glass v. U.S. Department of Health & Human Services, No. 17-cv-428, 2017 WL 5479442, at *5 (D.D.C. Nov. 14, 2017)

- *Bennett v. Bennett*, 682 F.2d 1039, 1042 (D.C. Cir. 1982)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA SHANNON A. BONDOC, Plaintiff, Civil Action No. 25 - 1416 (SLS) v. Judge Sparkle L. Sooknanan JAMES BLAKE, JR., Defendant. MEMORANDUM OPINION Shannon A. Bondoc brought this lawsuit against James Blake, Jr. alleging a long list of civil and criminal infractions. Ms. Bondoc and Mr. Blake share a child. According to Ms. Bondoc, she had primary custody of the child until 2012, when a court unlawfully transferred custody to Mr. Blake.

In this action, Ms. Bondoc asks the Court to, among other things, declare a “\$34,046 child support judgment void and unenforceable”; declare “prior custody orders... voidable”; “[s]tay related proceedings in state courts in Charles County, Prince George’s County, and Loudon County[, Maryland]”; and order a change of child “custody or, at minimum, reestablish federal visitation protections pending final relief.” Am.

Compl. at 10, ECF No. 7. Mr. Blake moves to dismiss this action for lack of subject-matter jurisdiction and failure to state a claim upon which relief can be granted under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). Mot., ECF No. 12. Both Parties are proceeding pro se, and Mr. Blake’s motion is fully briefed and ripe for review. Opp’n, ECF No. 15; Reply, ECF No. 16.

The Court recognizes that Ms. Bondoc is frustrated with the outcome of certain child-custody and child-support proceedings. But because this Court cannot exercise jurisdiction over Ms. Bondoc’s claims, the Court grants Mr. Blake’s motion and dismisses this case under Rule 12(b)(1). LEGAL STANDARD “When a defendant brings a Rule 12(b)(1) motion to dismiss, the plaintiff must demonstrate that the court indeed has subject-matter jurisdiction to hear his claims.” *Hill v. U.S. Dep’t of the Interior*, 699 F. Supp. 3d 1, 12 (D.D.C.

2023) (first citing *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 561 (1992); and then citing *U.S. Ecology, Inc. v. U.S. Dep’t of the Interior*, 231 F.3d 20, 24 (D.C. Cir. 2000)). In reviewing a motion to dismiss for lack of jurisdiction under Federal Rule of Civil Procedure 12(b)(1), courts “construe the complaint liberally, granting [the] plaintiff the benefit of all inferences that can be derived from the facts alleged.” *Thomas v. Principi*, 394 F.3d 970, 972 (D.C.

Cir. 2005) (quoting *Barr v. Clinton*, 370 F.3d 1196, 1199 (D.C. Cir. 2004)). “[T]he pleadings of pro se parties are to be ‘liberally construed’ and ‘held to less stringent standards than formal pleadings drafted by lawyers[.]’” *Tyson v. Brennan*, 277 F. Supp. 3d 28, 35 (D.D.C. 2017) (quoting *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (per curiam)). DISCUSSION Mr. Blake moves to dismiss this action, arguing that “[n]o jurisdictional basis exists for any federal claim touching family law” in this action.

Mot. 1. Ms. Bondoc responds that federal jurisdiction exists because her claims are brought under various federal statutes. Opp’n 1–2 (citing, among others, civil rights statutes, 42 U.S.C. §§ 1983, 1985, the civil Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1962, 1964, and the Indian Child Welfare Act, 25 U.S.C. § 1901 et seq.).

The Court agrees with Mr. Blake that it has no jurisdiction over Ms. Bondoc’s claims. Accordingly, it grants Mr. Blake’s motion and dismisses this case.¹ 1 Because the Court grants Mr. Blake’s Motion to Dismiss for lack of subject matter jurisdiction, Fed. R. Civ. P. 12(b)(1), it need not reach his Motion to Dismiss for failure to state a claim, Fed. R. Civ.

P. 12(b)(6). The Court does not consider any new arguments raised in Mr. Blake’s Reply. Accordingly, Ms. Bondoc’s Motion to Strike, ECF No. 19, is denied as moot. 2 “[F]undamentally, federal courts have no business interfering with child-custody proceedings in state court.” *Hickson v. Newell*, No. 24-cv-3576, 2025 WL 315144, at *1 (D.D.C. Jan. 28, 2025). Two abstention doctrines deprive the Court of jurisdiction to consider Ms. Bondoc’s claims.

A. Younger Abstention The Younger abstention doctrine prevents courts from exercising jurisdiction in certain cases related to ongoing state court proceedings. See *Younger v. Harris*, 401 U.S. 37, 44–45 (1971). Under Younger, the Court declines to hear Ms. Bondoc’s claims seeking to stay or interfere with ongoing Maryland family-court proceedings. See Am. Compl. at 10.

The Court applies a two-step analysis to determine whether the Younger doctrine applies. At the first step, it examines whether the state court litigation falls within one of three categories of cases: (1) ongoing state criminal prosecutions; (2) certain civil enforcement proceedings; and (3) pending “civil proceedings involving certain orders that are uniquely in furtherance of the state courts’ ability to perform their judicial functions.” *Sprint Commc’ns, Inc. v. Jacobs*, 571 U.S. 69, 78 (2013) (quoting *New Orleans Pub.*

Serv., Inc. v. Council of the City of New Orleans, 491 U.S. 350, 368 (1989)). “[C]hild-welfare litigation” is among the “state processes” covered by the doctrine. *Moore v. Sims*, 442 U.S. 415, 435 (1979). So “[c]hild custody proceedings fall into the third category and are a ‘strong candidate for Younger abstention.’” *Nellom v. Ambrose*, No. 22-cv-1283, 2022 WL 4120265, at *1 (E.D.

Pa. Sept. 9, 2022) (quoting *Smith v. Harrison*, No. 21-cv-5120, 2022 WL 445757, at *4 (E.D. Pa. Feb. 14, 2022)). At the second step, courts consider three factors: (1) whether there is an ongoing state judicial proceeding; (2) whether the proceeding implicates important state interests; and (3) whether there is an adequate opportunity to raise federal issues in the state proceeding.

See 3 *Hoai v. Sun Refin. & Mktg. Co.*, 866 F.2d 1515, 1518 (D.C. Cir. 1989) (citing *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass’n*, 457 U.S. 423, 432 (1982)). Here, all three factors counsel in favor of abstention.

First, Mr. Blake identifies ongoing divorce and child custody proceedings in Charles County, Maryland. Reply 2; see *Lee vs. Blake*, No. C-08-FM-22-001200 (Md. Cir. Ct. Charles Cnty. filed Aug. 29, 2022). And Ms. Bondoc expressly asks the Court to “[s]tay related proceedings in state courts” in that county. Am. Compl. at 10.

Second, family law and child custody proceedings implicate important state interests. “Family relations are a traditional area of state concern.” *Moore*, 442 U.S. at 435. And “custody arrangements implicate important state interests” for purposes of *Younger*. *Nellom*, 2022 WL 4120265, at *2.

For this reason, the Supreme Court has applied *Younger* to proceedings involving the custody of children. *Moore*, 442 U.S. at 435. Courts in this District have done the same. See, e.g., *Proctor v. Title 4-D*, 318 F. Supp. 3d 337, 346 (D.D.C. 2018); *Whitehead v. D.C. Child Support Servs. Div.*, 892 F. Supp. 2d 315, 318 (D.D.C. 2012); *Delaney v. District of Columbia*, 659 F. Supp. 2d 185, 194 (D.D.C.

2009). Third, Ms. Bondoc does not allege that she lacks “an adequate opportunity to raise” any federal issues in the state proceedings. *Proctor*, 318 F. Supp. 3d at 346. “[A] federal court... assume[s] that state procedures will afford an adequate remedy, in the absence of unambiguous authority to the contrary.” *Pennzoil Co. v. Texaco, Inc.*, 481 U.S. 1, 15 (1987).

And “state courts are more eminently suited to work on divorce, alimony, and child custody decrees than are federal courts, which lack the close association with state and local government organizations dedicated to handling issues that arise out of conflicts over those subjects.” *Proctor*, 318 F. Supp. 3d at 346 (internal quotation marks omitted) (quoting *Ankenbrandt v. Richards*, 504 U.S. 689, 704 (1992)).

4 All three factors point in the same direction. *Younger* prevents this Court from considering Ms. Bondoc’s requests to stay or otherwise interfere with the ongoing state proceedings in Maryland. See *Delaney*, 659 F. Supp. 2d at 194 (noting this approach is consistent with jurisprudence in the Third, Sixth, and Ninth Circuits and collecting cases). B. Rooker–Feldman Doctrine Another doctrine leads to the same result as to Ms. Bondoc’s claims seeking review of judgments already entered by Maryland courts.

See *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983); *Rooker v. Fidelity Tr. Co.*, 263 U.S. 413 (1923). The Rooker–Feldman doctrine applies to cases “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). In those circumstances, courts must dismiss because they “lack jurisdiction to review judicial decisions by state... courts.” *Richardson v. District of Columbia*

Court of Appeals, 83 F.3d 1513, 1514 (D.C. Cir. 1996).

Here, Ms. Bondoc asks the Court to relieve her from state child support, child custody, and forfeiture orders entered by state courts in Maryland. Am. Compl. at 10. The Rooker–Feldman doctrine prevents this Court from reviewing those judgments. See *Beasley v. Becker*, No. 24-cv-2832, 2024 WL 5008723, at *1 (D.D.C. Nov. 27, 2024) (applying the doctrine to a case challenging a child custody order); *Glass v. U.S. Dep’t of Health & Hum.*

Servs., No. 17-cv-428, 2017 WL 5479442, at *5 (D.D.C. Nov. 14, 2017) (dismissing challenge to child support orders under Rooker–Feldman doctrine).² 2 The domestic relations exception to federal jurisdiction generally deprives federal courts of jurisdiction over “cases involving the issuance of a divorce, alimony, or child custody decree,” *Ankenbrandt*, 504 U.S. at 704, or cases seeking to modify existing child support obligations or 5 CONCLUSION For these reasons, the Court grants the Defendant’s Motion to Dismiss, ECF No. 12.

A separate order will issue. SPARKLE L. SOOKNANAN United States District Judge Date: January 30, 2026 custody determinations, see *Bennett v. Bennett*, 682 F.2d 1039, 1042 (D.C. Cir. 1982) (federal courts lack jurisdiction to “resolve parental conflicts over the custody of... children”). Courts in this District have applied the exception in cases like this one.

See *Hickson*, 2025 WL 315144, at *1; *Beasley*, 2024 WL 5008723, at *1. Because the Court declines to exercise jurisdiction under *Younger* and *Rooker–Feldman*, it need not address whether the domestic relations exception also deprives it of jurisdiction. 6