

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

Brown v. Butler County Juvenile Court

No. 1:26-cv-367 (N.D. Ohio Feb. 18, 2026) · No. 1:26-cv-367 · Decided February 18, 2026

SUMMARY

The United States District Court for the Northern District of Ohio dismissed Plaintiffs’ pro se civil rights complaint concerning the removal and custody of children. The court held that the domestic-relations exception deprived it of jurisdiction over the child-custody claims and that the complaint’s Title VII allegations were unrelated to employment.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	J. Philip Calabrese
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	February 18, 2026
DOCKET	1:26-cv-367
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiffs filed a federal civil-rights complaint under 42 U.S.C. § 1983 and Title VII, alleging that the defendant unlawfully took children away and violated their civil rights. The court granted leave to proceed in forma pauperis and dismissed the complaint under 28 U.S.C. § 1915(e)(2) for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The court reviewed the complaint for subject-matter jurisdiction and dismissal under 28 U.S.C. § 1915(e)(2). Federal-question jurisdiction was assessed under the well-pleaded-complaint rule.
PRECEDENTIAL VALUE	District court opinion; precedential status is unknown in the source metadata.
PARTIES	Kayla Brown, Christy Brown, Jesse Black v. Butler County Juvenile Court

TOPICS

subject matter jurisdiction

child custody

section 1983

civil rights

pleadings

PRACTICE AREAS

civil procedure

family law

civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether the district court had subject-matter jurisdiction over claims challenging or arising from state-court child-custody proceedings.
2. Whether invoking 42 U.S.C. § 1983 and Title VII supplied federal-question jurisdiction when the substance of the complaint concerned domestic-relations matters.
3. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2).

HOLDINGS

1. The federal court lacked subject-matter jurisdiction because the core of plaintiffs' complaint concerned child custody, a domestic-relations matter over which state courts have exclusive jurisdiction.
2. The plaintiffs' references to 42 U.S.C. § 1983 and Title VII did not establish a viable basis for federal jurisdiction where the substance of the action involved child custody and the complaint alleged no employment-related facts.
3. The complaint was dismissed under 28 U.S.C. § 1915(e)(2).

KEY QUOTATIONS

"Federal courts have limited jurisdiction. Unlike State trial courts, they do not have general jurisdiction to review all questions of law." (Analysis)

"The Court lacks jurisdiction to determine the propriety of child custody." (Analysis)

"Pursuant to 28 U.S.C. § 1915(a)(3), the Court certifies that an appeal from this decision could not be taken in good faith." (Conclusion)

FACTUAL BACKGROUND

The complaint alleged that the Butler County Juvenile Court unlawfully took children away and violated plaintiffs' civil rights. Attached letters described Kayla Brown's drug use, alleged abuse of her children in foster care, her efforts to maintain sobriety, and a seven-year dispute with county authorities concerning custody. Christy Brown described similar circumstances involving children who were apparently her grandchildren. The complaint asserted claims under 42 U.S.C. § 1983 and Title VII but supplied no facts connecting the dispute to employment discrimination.

PROCEDURAL HISTORY

Plaintiffs filed a complaint against the Butler County Juvenile Court concerning the custody of children and alleged federal civil-rights violations. The district court granted their in forma pauperis application, reviewed the

complaint, determined that its core claims concerned child custody and domestic-relations matters, and dismissed the action. The court also certified under 28 U.S.C. § 1915(a)(3) that an appeal could not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Ohio ex rel. Skaggs v. Brunner, 549 F.3d 468, 474 (6th Cir. 2008)
- Kokkonen v. Guardian Life Ins. Co. of America, 511 U.S. 375, 377 (1994)
- Caterpillar Inc. v. Williams, 482 U.S. 386, 392 (1987)
- Franchise Tax Bd. v. Construction Laborers Vacation Tr., 463 U.S. 1, 27–28 (1983)
- Mikulski v. Centerior Energy Corp., 501 F.3d 555, 560 (6th Cir. 2007)
- Danforth v. Celebrezze, 76 F. App'x 615, 616–17 (6th Cir. 2003)
- Edelstein v. Flottman, No. 24-3156, 2025 WL 609487, at *3 (6th Cir. Jan. 10, 2025)

OPINION

Brown

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

KAYLA BROWN, et al.,) Case No. 1:26-cv-367) Plaintiffs,) Judge J. Philip Calabrese) v.)
Magistrate Judge) James E. Grimes, Jr.

BUTLER COUNTY JUVENILE)

COURT,)

) Defendant.))

OPINION AND ORDER

Plaintiffs Kayla Brown, Christy Brown, and Jesse Black bring this federal civil rights action, without a lawyer, against the Butler County Juvenile Court. As an initial matter, Plaintiffs filed an application to proceed in forma pauperis. (ECF No. 2.) The Court GRANTS that application.

BACKGROUND

Plaintiffs' complaint alleges that Defendant "unlawfully took children away, and they violated our civil rights." (ECF No. 1, PageID #2.) It purports to bring suit under 42 U.S.C. § 1983 and under Title VII, 42 U.S.C. § 2000e. (Id., PageID #1.) The complaint itself provides no other factual information about Plaintiffs' claims. (See generally id.) Instead, a series of single-spaced letters attached to the complaint describes Kayla Brown's drug use, the abuse her children allegedly suffered in foster care, and the efforts Ms. Brown has made to maintain sobriety for the last three

years. (See generally ECF No. 1-2.) Further, the letters describe a seven-year odyssey with the county authorities involving the custody of her children. (Id.) And Christy Brown recounts similar stories about the children at issue, who are apparently her grandchildren. (Id.)

ANALYSIS

Federal courts have limited jurisdiction. Unlike State trial courts, they do not have general jurisdiction to review all questions of law. See *Ohio ex rel. Skaggs v. Brunner*, 549 F.3d 468, 474 (6th Cir. 2008). Instead, federal courts only have authority to decide cases that the Constitution and Congress empower them to resolve. *Id.* Consequently, it is to be presumed that a cause of action lies outside this limited jurisdiction, and the burden of establishing jurisdiction rests with the party attempting to bring the case in federal court. *Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375, 377 (1994). Generally speaking, the Constitution and Congress have given federal courts authority to hear a case only where diversity of citizenship exists between the parties or where the case raises a federal question. *Caterpillar Inc. v. Williams*, 482 U.S. 386, 392 (1987). Here, Plaintiff alleges that the Court only has federal question jurisdiction. (ECF No. 1, ¶ 4, PageID #1.) This type of jurisdiction arises where a “well-pleaded complaint establishes either that federal law creates the cause of action or that the plaintiff’s right to relief necessarily depends on resolution of a substantial question of federal law.” *Franchise Tax Bd. v. Construction Laborers Vacation Tr.*, 463 U.S. 1, 27–28 (1983). In determining whether a claim arises under federal law, the Court looks only to the “well-pleaded allegations of the complaint and ignores potential defenses” a defendant may raise. *Mikulski v. Centerior Energy Corp.*, 501 F.3d 555, 560 (6th Cir. 2007). Although Plaintiff brings an action under 42 U.S.C. §§ 1983 and 2000e alleging violations of her federal civil rights, the Court nonetheless lacks jurisdiction. Federal courts lack jurisdiction over domestic relations matters. *Danforth v. Celebrezze*, 76 F. App’x 615, 616 (6th Cir. 2003). “Rather, state courts have exclusive jurisdiction over these matters.” *Id.* “Although this domestic relations exception to federal jurisdiction does not apply to a civil action that merely has domestic relations overtones . . . , federal courts lack jurisdiction where the action is a mere pretense and the suit is actually concerned with domestic relations issues.” *Id.* Whatever the merits of Plaintiffs’ claims, the core concern of the complaint involves child custody, which is a domestic relations issues over which federal courts lack jurisdiction. The Court lacks jurisdiction to determine the propriety of child custody. See, e.g., *Danforth*, 76 F. App’x at 616–17 (affirming application of the domestic relations exception to preclude subject-matter jurisdiction where a plaintiff raised constitutional claims to try “to obtain federal review of domestic relations matters”); *Edelstein v. Flottman*, No. 24-3156, 2025 WL 609487, at *3 (6th Cir. Jan. 10, 2025) (affirming dismissal where plaintiffs “couched their claims” in terms of constitutional violations but “the substance of the claims revolves around [a] state courts’ decisions in the domestic-relations proceedings as they relate to [child] custody and [child] visitation rights”). Finally, Plaintiffs’ claims under Title VII do not save the complaint. That statute prohibits invidious discrimination in employment based on race, sex, and certain other listed characteristics. Nothing in the complaint or the other materials

made a part of the pleadings gives any indication this lawsuit has anything to do with employment.

CONCLUSION

For these reasons, the Court DISMISSES Plaintiff's complaint under 28 U.S.C. § 1915(e)(2). (ECF No.1.) Pursuant to 28 U.S.C. § 1915(a)(3), the Court certifies that an appeal from this decision could not be taken in good faith. SO ORDERED. Dated: February 18, 2026 J.PhilipCalabrese
United States District Judge Northern District of Ohio