

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)