

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, TERRE HAUTE DIVISION

Philip D. Dennison v. June Caudill, Title IV-D Prosecutor, Indiana
Department of Child Services, and Indiana Bureau of Motor Vehicles

Dennison · No. 2:26-cv-00255-JRO-MKK · Decided April 23, 2026

SUMMARY

The United States District Court for the Southern District of Indiana grants Philip Dennison leave to proceed in forma pauperis but dismisses his complaint without prejudice for lack of subject-matter jurisdiction. The court concludes that the Rooker-Feldman doctrine, Eleventh Amendment and prosecutorial immunity, lack of standing for injunctive relief, and mootness bar the asserted claims concerning a driver's-license suspension and state-court conviction. The court permits Dennison to file an amended complaint by May 25, 2026, and warns him about Rule 11 compliance and the court's artificial-intelligence filing policy.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Terre Haute Division
WRITING FOR THE COURT	Judge J. R. Olson
JURISDICTION	United States District Court for the Southern District of Indiana, Terre Haute Division
DECIDED	April 23, 2026
DOCKET	2:26-cv-00255-JRO-MKK
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se plaintiff moved to proceed in forma pauperis and filed a 42 U.S.C. § 1983 complaint alleging due-process violations arising from suspension of his driver's license, a state-court driving-while-suspended prosecution, and related requests for declaratory and injunctive relief. The district court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the complaint without prejudice for lack of subject-matter jurisdiction, and permitted amendment.
STANDARD OF REVIEW	On in forma pauperis screening, the court applied the Federal Rule of Civil Procedure 12(b)(6) standard, accepting well-pleaded allegations

as true and viewing them in the light most favorable to the plaintiff. The court independently examined subject-matter jurisdiction and dismissed under 28 U.S.C. § 1915(e)(2)(B).

PRECEDENTIAL VALUE

unpublished

PARTIES

Philip D. Dennison v. June Caudill, Title IV-D Prosecutor, Indiana Department of Child Services, Indiana Bureau of Motor Vehicles

TOPICS

subject matter jurisdiction

civil procedure

section 1983

due process

injunctions

PRACTICE AREAS

civil procedure

constitutional law

civil rights

government liability

remedies

QUESTIONS PRESENTED

1. Whether the federal district court could review or vacate Dennison's state-court conviction under the Rooker-Feldman doctrine.
2. Whether the Indiana Department of Child Services and Indiana Bureau of Motor Vehicles were subject to suit under 42 U.S.C. § 1983 in federal court.
3. Whether prosecutorial immunity barred Dennison's claim for damages against the Title IV-D prosecutor for conduct undertaken during the judicial phase of the prosecution.
4. Whether Dennison had Article III standing to seek prospective injunctive relief against future allegedly unlawful procedures.
5. Whether Dennison's claims concerning the already-reinstated driver's-license suspension were moot.
6. Whether the complaint was subject to dismissal under 28 U.S.C. § 1915(e)(2)(B) for lack of subject-matter jurisdiction and whether amendment should be permitted.

HOLDINGS

1. A federal district court lacks jurisdiction to review, vacate, or enjoin enforcement of a state-court judgment; Dennison's claim seeking to void or vacate his state conviction was dismissed.
2. The Indiana Department of Child Services and Indiana Bureau of Motor Vehicles were not persons subject to suit under 42 U.S.C. § 1983 and were protected from suit in federal court by the Eleventh Amendment; claims against them were dismissed.
3. A prosecutor is absolutely immune from § 1983 damages liability for conduct functionally related to the judicial phase of the criminal process; Dennison's damages claim against Caudill was dismissed.
4. A plaintiff seeking prospective injunctive relief must show a real and immediate threat of future injury; Dennison lacked standing because he alleged no sufficient likelihood of being subjected again to the challenged procedures.

5. Claims seeking declaratory or injunctive relief concerning a driver's-license suspension are moot when the suspension has already been lifted and no live controversy remains; Dennison's suspension-related claim was dismissed as moot.
6. A pro se litigant should generally be given an opportunity to amend a defective complaint at an early stage when amendment may not be futile; Dennison was permitted to file an amended complaint by May 25, 2026.

KEY QUOTATIONS

“no matter how erroneous or unconstitutional the state court judgment may be, the Supreme Court of the United States is the only federal court that could have jurisdiction to review a state court judgment.” (Section IV.A)

“Prosecutors are absolutely immune from liability for damages under § 1983 for conduct that is functionally prosecutorial; this immunity is understood to broadly cover all conduct associated with the judicial phase of the criminal process.” (Section IV.B)

“The usual standard in civil cases is to allow defective pleadings to be corrected, especially in early stages, at least where amendment would not be futile.” (Section V)

FACTUAL BACKGROUND

During Dennison's incarceration in fall 2025, the Indiana Bureau of Motor Vehicles issued a notice suspending his driver's license based on information from the Title IV-D agency that he had failed to appear for a child-support hearing. The suspension took effect shortly after his release, and he learned of it after being cited for driving while suspended; Indiana reinstated his license on January 2, 2026, after he paid his support. Dennison later alleged that a Title IV-D prosecutor improperly prosecuted him in an Owen County Circuit Court proceeding, where he was convicted of driving while suspended on April 9, 2026.

PROCEDURAL HISTORY

Dennison filed this federal action after the Indiana Bureau of Motor Vehicles suspended his driver's license and an Owen County Circuit Court convicted him of driving while suspended. The district court granted leave to proceed in forma pauperis and screened the complaint. It dismissed the claims under the Rooker-Feldman doctrine, sovereign and prosecutorial immunity, lack of standing, and mootness, while allowing Dennison until May 25, 2026, to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- *Robbins v. Switzer*, 104 F.3d 895, 898 (7th Cir. 1997)
- *Denton v. Hernandez*, 504 U.S. 25, 34 (1992)
- *Arnett v. Webster*, 658 F.3d 742, 751 (7th Cir. 2011)

- Santiago v. Walls, 599 F.3d 749, 756 (7th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Swanson v. Citibank, N.A., 614 F.3d 400, 403 (7th Cir. 2010)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Arbaugh v. Y & H Corp., 546 U.S. 500, 514 (2006)
- Buethe v. Britt Airlines, 749 F.2d 1235, 1238 (7th Cir. 1984)
- Center for Dermatology & Skin Cancer, Ltd. v. Burwell, 770 F.3d 586, 588-89 (7th Cir. 2014)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Remer v. Burlington Area School District, 205 F.3d 990, 996 (7th Cir. 2000)
- Johnson v. Supreme Court of Illinois, 165 F.3d 1140, 1141 (7th Cir. 1999)
- Bianchi v. McQueen, 818 F.3d 309, 316 (7th Cir. 2016)
- TransUnion LLC v. Ramirez, 594 U.S. 413, 423, 425 (2021)
- Raines v. Byrd, 521 U.S. 811, 819 (1997)
- Simic v. City of Chicago, 851 F.3d 734, 738 (7th Cir. 2017)
- City of Los Angeles v. Lyons, 461 U.S. 95, 102, 111 (1983)
- Already, LLC v. Nike, Inc., 568 U.S. 85, 91 (2013)
- Murphy v. Hunt, 455 U.S. 478, 481 (1982) (per curiam)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Tate v. SCR Medical Transportation, 809 F.3d 343, 346 (7th Cir. 2016)
- Luevano v. Wal-Mart Stores, Inc., 722 F.3d 1014 (7th Cir. 2013)
- Beal v. Beller, 847 F.3d 897, 901 (7th Cir. 2017)