

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

Jaron Blue Butler v. Travis John Willey, et al.

Jaron Blue Butler v. Travis John Willey, No. 1:26-cv-00119-LEW (D. Me. Apr. 17, 2026) · No. 1:26-cv-00119-LEW · Decided April 17, 2026

SUMMARY

A U.S. Magistrate Judge recommends dismissal of Jaron Blue Butler’s second amended civil-rights complaint concerning the removal of his children and termination of his parental rights in state court proceedings. The recommended decision concludes that the claims are barred by the Rooker-Feldman doctrine and, alternatively, fail to plead sufficient facts to state an actionable claim under 28 U.S.C. §§ 1915 and 1915A.

CASE DETAILS

COURT	United States District Court for the District of Maine
WRITING FOR THE COURT	John C. Nivison
JURISDICTION	United States District Court for the District of Maine
DECIDED	April 17, 2026
DOCKET	1:26-cv-00119-LEW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a prisoner proceeding in forma pauperis, filed a second amended federal complaint against employees of the Maine Department of Health and Human Services alleging constitutional violations arising from state child-protection proceedings and the termination of his parental rights. Following screening under 28 U.S.C. §§ 1915(e)(2) and 1915A, the magistrate judge issued a recommended decision advising dismissal.
STANDARD OF REVIEW	Screening under 28 U.S.C. §§ 1915(e)(2) and 1915A; the court assumed the truth of well-pleaded facts and gave Plaintiff the benefit of reasonable inferences, while applying the plausibility standard for failure to state a claim.
PRECEDENTIAL VALUE	Nonprecedential recommended decision

TOPICS

- subject matter jurisdiction
- family law procedure
- termination of parental rights
- pleadings
- civil procedure

PRACTICE AREAS

civil procedure

constitutional law

civil rights

family law

QUESTIONS PRESENTED

1. Whether the Rooker-Feldman doctrine barred the federal action because Plaintiff sought relief from a state-court order terminating his parental rights.
2. Whether the second amended complaint stated a plausible constitutional claim under the standards applicable to prisoner and in forma pauperis screening.

HOLDINGS

1. The action was barred by the Rooker-Feldman doctrine because Plaintiff was a state-court loser seeking relief from, and effectively reversal of, the state-court order terminating his parental rights.
2. Even if Rooker-Feldman did not bar the action, the second amended complaint failed to state an actionable constitutional claim because its allegations were conclusory and lacked sufficient supporting facts.

KEY QUOTATIONS

“The Rooker-Feldman doctrine prevents the lower federal courts from exercising jurisdiction over cases brought by ‘state-court losers’ challenging ‘state-court judgments rendered before the district court proceedings commenced.’”

“A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action will not do.”

FACTUAL BACKGROUND

Plaintiff, who was incarcerated at the Maine State Prison, alleged that employees of the Maine Department of Health and Human Services unlawfully seized his children and used exaggerated allegations and false statements to obtain a state-court order terminating his parental rights. He asserted that the children were removed without a warrant or exigent circumstances, that he was denied a meaningful opportunity to be heard, and that Defendants interfered with his fundamental right to family integrity. The court found that these allegations were conclusory and that the action challenged the state-court termination order itself.

PROCEDURAL HISTORY

The Court granted Plaintiff's application to proceed without prepayment of fees. Plaintiff filed two amended complaints on consecutive days, which the court treated collectively as a second amended complaint. After conducting the required statutory screening, the magistrate judge recommended dismissal and denied Plaintiff's pending motions concerning records and preservation of evidence; the recommendation was subject to objections and de novo review by the district court.

DISPOSITION

other

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 324 (1989)
- Ocasio-Hernandez v. Fortuno-Burset, 640 F.3d 1, 12 (1st Cir. 2011)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Waterman v. White Interior Solutions, No. 2:19-cv-00032-JDL, 2019 WL 5764661, at *2 (D. Me. Nov. 5, 2019)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Ferranti v. Moran, 618 F.2d 888, 890 (1st Cir. 1980)
- Lance v. Dennis, 546 U.S. 459, 460 (2006)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Davison v. Government of Puerto Rico-Puerto Rico Firefighters Corps., 471 F.3d 220, 223 (1st Cir. 2006)
- Miller v. Nichols, 592 F. Supp. 2d 191, 195-96 (D. Me. 2009)
- Hoblock v. Albany County Board of Elections, 422 F.3d 77, 87 (2d Cir. 2005)
- Doe v. Mann, 415 F.3d 1038, 1043 (9th Cir. 2005)
- Young v. Wells Fargo Bank, N.A., 717 F.3d 224, 231 (1st Cir. 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)

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