

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PRECEDENTIAL VALUE	Nonprecedential recommended decision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)

OPINION

GRMLCH

PER CURIAM.

UNITED STATES DISTRICT COURT

DISTRICT OF MAINE

JARON BLUE BUTLER,)

) Plaintiff)) v.) 1:26-cv-00119-LEW) TRAVIS JOHN WILLEY, et al.,)) Defendants)

RECOMMENDED DECISION AFTER REVIEW

OF PLAINTIFF'S SECOND AMENDED COMPLAINT

Plaintiff, who is in custody at the Maine State Prison, seeks to assert a federal claim based upon constitutional violations that the defendants, who are employees of the Maine Department of Health and Human Services, allegedly committed in the context of state child protection proceedings. (Second Amended Complaint, ECF Nos. 11, 13.)¹ Plaintiff filed an application to proceed without prepayment of fees (ECF No. 4), which application the Court granted. (Order, ECF No. 5.) In accordance with the statute that governs actions where a plaintiff proceeds without prepayment of fees, a preliminary review of Plaintiff's second amended complaint is appropriate.

28 U.S.C. § 1915(e)(2). Additionally, Plaintiff's second amended complaint is subject to screening "before docketing, if feasible or ... as soon as practicable after docketing," 1 On consecutive days, Plaintiff filed two amended complaints. I considered both filings collectively as Plaintiff's second amended complaint. because he is "a prisoner seek[ing] redress from a governmental entity or officer or employee of a governmental entity." 28 U.S.C. § 1915A(a). After a review of Plaintiff's second amended complaint, I recommend the Court dismiss the matter.

LEGAL STANDARD

28 U.S.C. § 1915 is designed to ensure meaningful access to the federal courts for individuals unable to pay the cost of bringing an action. When a party is proceeding pursuant to § 1915, however, "the court shall dismiss the case at any time if the court determines," *inter alia*, that the action is "frivolous or malicious" or "fails to state a claim on which relief may be granted." 28 U.S.C. § 1915(e)(2)(B). "Dismissals [under § 1915] are often made sua sponte prior to the issuance of process, so as to spare prospective defendants the inconvenience and expense of answering such complaints." *Neitzke v. Williams*, 490 U.S. 319, 324 (1989). The § 1915A screening requires courts to "identify cognizable claims or dismiss the complaint, or any portion of the complaint, if the complaint (1) is frivolous, malicious, or fails to state a claim ...; or (2) seeks monetary relief from a defendant who is immune from such relief." 28 U.S.C. § 1915A(b). When considering whether a complaint states a claim for which relief may be granted, courts must assume the truth of all well-plead facts and give the plaintiff the benefit of all reasonable inferences therefrom. *Ocasio-Hernandez v. Fortuno-Burset*, 640 F.3d 1, 12 (1st Cir. 2011). A complaint fails to state a claim upon which relief can be granted if it does not plead "enough facts to state a claim to relief that is plausible on its face." *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 570 (2007). "A self-represented plaintiff is not exempt from this framework, but the court must construe his complaint 'liberally' and hold it 'to less stringent standards than formal pleadings drafted by lawyers.'" *Waterman v. White Interior Sols.*, No. 2:19-cv-00032-JDL, 2019 WL 5764661, at *2 (D. Me. Nov. 5, 2019) (quoting *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)). "This is not to say that pro se plaintiffs are not required to plead basic facts sufficient to state a claim." *Ferranti v. Moran*, 618 F.2d 888, 890 (1st Cir. 1980).

DISCUSSION

Plaintiff alleges that the defendants unlawfully seized his children and, through exaggerated allegations and false statements, sought and obtained a court order terminating his parental rights. "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.'" *Lance v. Dennis*, 546 U.S. 459, 460 (2006) (quoting *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005), and discussing *Rooker v. Fidelity Trust Co.*, 263 U.S. 413 (1923) and *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983)). In general, "the proper forum for challenging an unlawful state court ruling" is the state appellate system followed by a petition for review by the United States Supreme Court.

Davison v. Gov't of Puerto Rico-Puerto Rico Firefighters Corps., 471 F.3d 220, 223 (1st Cir. 2006); 28 U.S.C. § 1257. This Court previously observed that “multiple federal courts have acknowledged that federal cases seeking to challenge the termination of parental rights by state courts fall within the heartland of cases preempted by the Rooker–Feldman doctrine.” *Miller v. Nichols*, 592 F. Supp. 2d 191, 195-96 (D. Me. 2009) (citing *Hoblock v. Albany County Bd. of Elections*, 422 F.3d 77, 87 (2d Cir.2005) (“Suppose a state court . . . terminates a father’s parental rights and orders the state to take custody of his son. If the father sues in federal court for the return of his son on grounds that the state judgment violates his federal substantive due-process rights as a parent, he is complaining of an injury caused by the state judgment and seeking its reversal. This he may not do, regardless of whether he raised any constitutional claims in state court, because only the Supreme Court may hear appeals from state-court judgments.”); *Doe v. Mann*, 415 F.3d 1038, 1043 (9th Cir. 2005) (concluding that a challenge to the termination of parental rights fell “within the traditional boundaries of the Rooker–Feldman doctrine” while ultimately holding that there was jurisdiction based on a narrow exception for “child custody proceedings involving Indian children”). Through this action, Plaintiff challenges the state court proceeding that resulted in the termination of his parental rights. In other words, Plaintiff seeks relief from the state court’s order terminating his parental rights. As with the claim asserted in *Miller*, Plaintiff’s claim is precluded by the Rooker-Feldman doctrine. Dismissal, therefore, is warranted. Even if Plaintiff’s claim was not barred by the Rooker-Feldman doctrine, dismissal is appropriate because Plaintiff’s second amended complaint lacks sufficient facts to support an actionable claim. For instance, Plaintiff alleges that “Defendants removed [his] children without a warrant and without exigent circumstances,” that he was “denied a meaningful opportunity to be heard,” and that “Defendants interfered with [his] fundamental right to family integrity,” but has not alleged facts to support the allegations. Plaintiff’s conclusory assertions are insufficient to state an actionable claim. See *Young v. Wells Fargo Bank, N.A.*, 717 F.3d 224, 231 (1st Cir. 2013) (complaint may not consist entirely of “conclusory allegations that merely parrot the relevant legal standard.”). The Federal Rules of Civil Procedure “demand[] more than an unadorned, the-defendant-unlawfully-harmed-me accusation.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009). “A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action will not do.” *Id.*

CONCLUSION

After a review of Plaintiff’s second amended complaint pursuant to 28 U.S.C. §§ 1915 and 1915A, for the reasons explained above, I recommend the Court dismiss the matter.²

NOTICE

Any objection to the Court’s orders on Plaintiff’s motions shall be filed in accordance with Federal Rule of Civil Procedure 72. A party may file objections to those specified portions of a magistrate judge’s report or proposed findings or recommended decisions entered pursuant to 28 U.S.C. § 636(b)(1)(B) for which de novo review by the district court is sought, together with a supporting

memorandum, within fourteen (14) days of being served with a copy thereof. Failure to file a timely objection shall constitute a waiver of the right to de novo review by the district court and to appeal the district court's order. /s/ John C. Nivison U.S. Magistrate Judge Dated this 17th day of April, 2026. 2 Plaintiff recently filed several motions regarding his desire to obtain records regarding the state court proceedings and to preserve certain evidence. (Motions, ECF Nos. 8, 9, 14.) Because I recommend the dismissal of the matter, I deny the motions.