

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Sandra Vatalaro v. Garland Popeo et al.

Vatalaro · No. 6:26-CV-156 (AJB/ML) · Decided April 3, 2026

SUMMARY

The United States District Court for the Northern District of New York adopts a magistrate judge’s Report and Recommendation and dismisses Sandra Vatalaro’s second amended complaint without prejudice and without leave to amend. The court concludes that the claims concerning state criminal convictions and the continued ignition-interlock requirement are frivolous, time-barred, barred by immunity or other doctrines, or insufficiently pleaded, and indicates that any appropriate remedy likely lies in state court.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Anthony J. Brindisi
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	April 3, 2026
DOCKET	6:26-CV-156 (AJB/ML)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending dismissal of her second amended complaint without leave to amend. The district court conducted de novo review, accepted and adopted the Report and Recommendation, and dismissed the complaint without prejudice but without leave to further amend.
STANDARD OF REVIEW	De novo review of the magistrate judge's Report and Recommendation under 28 U.S.C. § 636(b)(1)(C).
PRECEDENTIAL VALUE	Unpublished federal district court order; generally nonprecedential.
PARTIES	Sandra Vatalaro v. Garland Popeo, New York State DMV Commissioner, Oneida County District Attorney

TOPICS

section 1983

procedural due process

post-conviction relief

eleventh amendment immunity

motions to dismiss

PRACTICE AREAS

Civil procedure

Civil rights

Constitutional law

Administrative law

Post-conviction relief

QUESTIONS PRESENTED

1. Whether the magistrate judge's recommendation to dismiss the second amended complaint should be accepted after de novo review of plaintiff's objections.
2. Whether plaintiff plausibly alleged a federal constitutional or 42 U.S.C. § 1983 claim based on the continued imposition of an ignition interlock device.
3. Whether any challenge to the state-law consequences of plaintiff's criminal conviction was timely and cognizable in federal court.
4. Whether plaintiff should be granted leave to further amend her complaint.

HOLDINGS

1. After de novo review, the district court accepted and adopted the magistrate judge's Report and Recommendation because plaintiff's objections did not warrant relief.
2. Plaintiff did not plausibly allege a constitutional procedural due process claim because she failed to identify how her state-law property rights were violated or how the process she received was constitutionally inadequate.
3. Any collateral challenge to state-law consequences flowing from plaintiff's early-2010s criminal conviction was time-barred and would also be subject to dismissal on the immunity and other grounds identified in the Report and Recommendation.
4. Further amendment was denied because plaintiff had been given several opportunities to submit a legible and factually sufficient complaint, yet the operative pleading still failed to state a plausible constitutional claim.

KEY QUOTATIONS

"In sum, plaintiff's second amended complaint does not plausibly allege any constitutional claims that would give rise to federal-court jurisdiction, and based on a review of the filings and the procedural history of this case it does not appear that granting plaintiff leave to further amend would be productive."

"Plaintiff's second amended complaint (Dkt. No. 15) is DISMISSED without prejudice but without leave to further amend."

FACTUAL BACKGROUND

Plaintiff alleged that she was charged with state-court crimes between 2010 and 2012, pleaded guilty under duress, completed her sentence, and paid her fines. She alleged that she nevertheless remained subject to an

ignition interlock device because of a change in state law. Her filings were repeatedly illegible or failed to provide facts explaining how defendants violated her rights or why the process afforded by the New York State DMV was constitutionally inadequate.

PROCEDURAL HISTORY

Plaintiff filed a civil-rights action, several amended complaints, applications to proceed in forma pauperis, motions for temporary restraining orders, and a petition for a writ of mandamus. After granting in forma pauperis status, the magistrate judge recommended dismissal of the second amended complaint as frivolous and nonsensical, immune from suit, barred by Rooker-Feldman or the limitations period, and not curable by amendment. Plaintiff objected and sought recusal of the magistrate judge. The district court denied or rejected the requested relief, reviewed the Report and Recommendation de novo, adopted it, dismissed the complaint without prejudice without leave to amend, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Forjone v. Dep't of Motor Vehicles, 414 F. Supp. 3d 292, 303-04 (N.D.N.Y. 2019)
- Collins v. Saratoga Cnty. Support Collection Unit, 2012 WL 2571288, at *6-*7 (N.D.N.Y. July 3, 2012)

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