

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, HOT SPRINGS DIVISION

Melvin Lee Jackson, Jr. v. Douglas A. Collins, Secretary of Veterans
Affairs and The United States Department of Veterans Affairs

Jackson v. Collins · No. 2:25-cv-06102-SOH-MEF · Decided February 25, 2026

SUMMARY

A United States magistrate judge recommends granting the defendants’ Rule 12(b)(1) and 12(b)(6) motion to dismiss a complaint challenging the Department of Veterans Affairs’ treatment of the plaintiff’s military discharge classification and benefits-related claims. The report concludes that the Veterans’ Judicial Review Act deprives the district court of subject-matter jurisdiction because resolving the claims would require review of VA decisions affecting veterans’ benefits.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Hot Springs Division
WRITING FOR THE COURT	Mark E. Ford
JURISDICTION	United States District Court for the Western District of Arkansas, Hot Springs Division
DECIDED	February 25, 2026
DOCKET	2:25-cv-06102-SOH-MEF
DISPOSITION	other
PROCEDURAL POSTURE	Magistrate judge's report and recommendation on defendants' motion to dismiss for lack of subject-matter jurisdiction and failure to state a claim.
STANDARD OF REVIEW	On a Rule 12(b)(1) factual challenge, the plaintiff bears the burden of establishing subject-matter jurisdiction, and the court may consider materials outside the pleadings and make factual findings using any rational mode of inquiry. On a Rule 12(b)(6) motion, the complaint must contain sufficient factual matter to state a plausible claim for relief, with factual allegations accepted as true and reasonable inferences drawn for the nonmoving party.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Melvin Lee Jackson, Jr. v. Douglas A. Collins, Secretary of Veterans Affairs, The United States Department of Veterans Affairs

TOPICS

subject matter jurisdiction

motions to dismiss

veterans benefits

administrative law

civil procedure

PRACTICE AREAS

veterans benefits

administrative law

civil procedure

constitutional law

military law

QUESTIONS PRESENTED

1. Whether the Veterans' Judicial Review Act deprived the district court of subject-matter jurisdiction because adjudicating Jackson's claims would require review of VA decisions or procedures affecting veterans' benefits.
2. Whether Jackson's complaint satisfied the plausibility and pleading requirements of Federal Rule of Civil Procedure 8(a)(2) and survived dismissal under Rule 12(b)(6).

HOLDINGS

1. The magistrate judge concluded that the Veterans' Judicial Review Act strips the district court of subject-matter jurisdiction over Jackson's claims because resolving them would require the court to determine whether VA officials properly handled matters affecting his benefits and services.
2. The report recited the Rule 12(b)(6) plausibility standard and recommended dismissal of the complaint; the recommended disposition rested principally on lack of subject-matter jurisdiction.

KEY QUOTATIONS

"Accordingly, the undersigned finds that this Court lacks subject matter jurisdiction to hear this case." (III.A)

"For the reasons discussed above, it is RECOMMENDED that the Government's Motion to Dismiss (ECF No. 36) be GRANTED and Plaintiff's Complaint dismissed." (IV)

FACTUAL BACKGROUND

Jackson challenged the VA's classification of his military discharge as "other than honorable" and alleged that the classification resulted in denial of VA services. He claimed that VA officials used nonstatutory labels, diverted him from statutory adjudication procedures, used standardized denial language, and mishandled benefits requests in 2012, 2014, 2021, and 2025. He sought declaratory or injunctive relief, including an order directing the defendants to stop using certain labels and immediately adjudicate his claim.

PROCEDURAL HISTORY

Jackson filed a complaint alleging violations of the Rehabilitation Act, Administrative Procedure Act, Mandamus Act, and the Constitution arising from the Department of Veterans Affairs' treatment of his military-discharge classification and denial of services. After defendants moved to dismiss, Jackson responded and filed

supplemental materials. The magistrate judge recommended granting the motion and dismissing the complaint, subject to the parties' fourteen-day period for objections and de novo review by the district judge.

DISPOSITION

other

CASES CITED

- Herden v. United States, 726 F.3d 1042, 1046 (8th Cir. 2013) (en banc)
- Green Acres Enters., Inc. v. United States, 418 F.3d 852, 856 (8th Cir. 2005)
- Osborn v. United States, 918 F.2d 724, 729-30 (8th Cir. 1990)
- Crawford v. United States, 796 F.2d 924, 928 (7th Cir. 1986)
- Buckler v. United States, 919 F.3d 1038, 1044 (8th Cir. 2019)
- Am. Fam. Mut. Ins. Co. v. Vein Centers for Excellence, Inc., 912 F.3d 1076, 1081 (8th Cir. 2019)
- Davis v. Anthony, Inc., 886 F.3d 674, 679 (8th Cir. 2018)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 562, 570 (2007)
- Whitney v. Guys, Inc., 700 F.3d 1118, 1128 (8th Cir. 2012)
- Lustgraaf v. Behrens, 619 F.3d 867, 872-73 (8th Cir. 2010)
- Reynolds v. Dormire, 636 F.3d 976, 979 (8th Cir. 2011)
- Huggins v. FedEx Ground Package Sys., Inc., 592 F.3d 853, 862 (8th Cir. 2010)
- Delker v. MasterCard Int'l, Inc., 21 F.4th 1019, 1024 (8th Cir. 2022)
- Hicks v. Veteran's Admin., 961 F.2d 1367, 1369 (8th Cir. 1992)
- Mehrkens v. Blank, 556 F.3d 865, 869-70 (8th Cir. 2009)
- Schweiker v. Chilicky, 487 U.S. 412, 421 (1988)
- Thomas v. Principi, 394 F.3d 970, 974-75 (D.C. Cir. 2005)
- Smart v. U.S., 2025 WL 3145714, at *3 (W.D. Tex. Feb. 5, 2025)
- Weaver v. United States, 98 F.3d 518, 519-20 (10th Cir. 1996)
- Hicks v. Small, 69 F.3d 967, 969 (9th Cir. 1995)
- Laird v. Tatum, 408 U.S. 1, 15 (1972)