

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ANDERSON/GREENWOOD DIVISION

Boyle v. Oconee County

Boyle · No. 8:25-cv-10398-JDA · Decided April 8, 2026

SUMMARY

The United States District Court for the District of South Carolina reviews a magistrate judge’s recommendation to dismiss Jason Michael Boyle’s pro se § 1983 action. The court dismisses the federal claims against the defendants, largely under Younger abstention, Heck, immunity, and pleading principles, but allows a First Amendment retaliation claim against Deputy Preston Kirby to proceed and recommits the matter for service and further review of state-law claims. The court also denies leave to amend.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Anderson/Greenwood Division
WRITING FOR THE COURT	Jacquelyn D. Austin
JURISDICTION	United States District Court for the District of South Carolina, Anderson/Greenwood Division
DECIDED	April 8, 2026
DOCKET	8:25-cv-10398-JDA
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation recommending dismissal of a pro se § 1983 action at initial review under 28 U.S.C. § 1915(e)(2)(B). After considering Plaintiff's objections, the court accepted the recommendation in part, rejected it in part, dismissed most federal claims, and recommitted the matter for service and further initial review.
STANDARD OF REVIEW	The district court conducts de novo review of portions of a magistrate judge's report to which specific objections are made and reviews unobjected portions for clear error. At initial review under 28 U.S.C. § 1915(e)(2)(B), the court determines whether the complaint is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant.

PRECEDENTIAL VALUE	Unknown; federal district court opinion
PARTIES	Jason Michael Boyle v. Oconee County, Oconee County Sheriff's Office, Oconee County Detention Center, Sheriff Mike Crenshaw, Captain Jeremy Chapman, Deputy Jimmy Dixon, Officer Honea, Deputy Preston Kirby, John/Jane Does 1–10

TOPICS

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QUESTIONS PRESENTED

1. Whether Younger abstention barred claims arising from Boyle's ongoing state contempt proceedings and related incarcerations.
2. Whether Heck v. Humphrey barred damages claims based on the contempt proceedings and resulting incarceration.
3. Whether the Oconee County Detention Center and Oconee County Sheriff's Office were persons subject to suit under 42 U.S.C. § 1983.
4. Whether Boyle plausibly alleged municipal liability against Oconee County under Monell.
5. Whether Boyle plausibly alleged Fourth Amendment claims against Deputies Dixon and Honea.
6. Whether Boyle plausibly alleged supervisory liability against Sheriff Crenshaw.
7. Whether Boyle plausibly alleged a First Amendment retaliation claim against Deputy Kirby.
8. Whether the court should dismiss or retain Boyle's state-law claims and whether leave to amend should be granted.

HOLDINGS

1. Younger abstention barred Boyle's claims arising from the state contempt proceedings because the proceedings were ongoing, implicated the state's important interest in vindicating the regular operation of its judicial system, and afforded an adequate opportunity to raise federal claims.
2. Heck v. Humphrey barred Boyle's damages claims arising from the contempt proceedings and resulting incarceration because success on those claims would improperly undermine the contempt judgments, which had not been invalidated or otherwise set aside.
3. The Oconee County Detention Center and Oconee County Sheriff's Office were not persons subject to suit under § 1983, so all claims against them were dismissed.
4. Boyle failed to state a Monell claim against Oconee County because he did not identify a specific municipal deficiency and establish its causal connection to a specific constitutional violation.

5. Boyle failed to state a Fourth Amendment search-or-seizure claim against Dixon because approaching a home and knocking without a warrant is ordinarily within the implied license of a private visitor, and Dixon left when Boyle demanded a warrant.
6. Boyle failed to state a Fourth Amendment claim against Honea because, even assuming Honea bypassed a locked gate and ignored a no-trespassing sign, entering the property for the limited purpose of serving probate-court orders did not constitute an unconstitutional search.
7. Boyle failed to state a supervisory-liability claim against Crenshaw because he failed to allege an underlying constitutional violation attributable to Dixon, and claims arising from the contempt proceedings were independently barred by Younger and/or Heck.
8. Boyle sufficiently alleged a First Amendment retaliation claim against Kirby to survive initial review and summary dismissal.
9. The court declined to dismiss Boyle's state-law claims solely on the ground that all federal claims had been dismissed because the First Amendment retaliation claim against Kirby survived initial review. The court recommitted the state-law claims for further initial review under § 1915.
10. The court denied Boyle's request for leave to amend because he did not submit a proposed amended complaint that was complete in itself.

KEY QUOTATIONS

“The Court disagrees. That Singleton’s initial contempt order purportedly lacked a case number or a docket entry does not invalidate the proceedings” (Discussion—Younger v. Harris)

“The Court finds these allegations sufficient to survive summary dismissal, as a threat of violence by a deputy is likely to be considered an adverse action that would chill a person of ordinary firmness from continuing his or her lawful protest.” (Discussion—Deputy Preston Kirby)

FACTUAL BACKGROUND

Boyle alleged that Oconee County law-enforcement personnel engaged in unlawful investigations, trespass, retaliatory threats, false reporting, and unconstitutional detention between 2020 and 2024. He challenged contempt proceedings in the Oconee County Probate Court that resulted in his incarceration and asserted that county officials enforced allegedly invalid orders. He also alleged that Deputy Preston Kirby threatened to return and physically assault him while Boyle was conducting a peaceful protest outside the probate court. The state contempt proceedings remained pending on appeal in the South Carolina Court of Appeals.

PROCEDURAL HISTORY

Boyle filed a complaint under 42 U.S.C. § 1983 and related state-law claims. The matter was referred to Magistrate Judge William S. Brown, who recommended dismissal without issuance and service of process and without leave to amend. Boyle objected. The district court dismissed the federal claims except the First Amendment retaliation claim against Deputy Kirby, denied leave to amend, recommitted the case to the magistrate judge to authorize service on Kirby, and ordered further initial review of the state-law claims.

DISPOSITION

REMAND INSTRUCTIONS

The matter was recommitted to Magistrate Judge William S. Brown to authorize service of process on Deputy Preston Kirby for the First Amendment retaliation claim and to conduct further initial review of Boyle's state-law claims under 28 U.S.C. § 1915.

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270–71 (1976)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1278 (4th Cir. 1985)
- Younger v. Harris, 401 U.S. 37 (1971)
- Martin Marietta Corp. v. Maryland Commission on Human Relations, 38 F.3d 1392, 1396 (4th Cir. 1994)
- Juidice v. Vail, 430 U.S. 327, 335 (1977)
- Brandt v. Gooding, 630 S.E.2d 259, 264 (S.C. 2006)
- State v. Kennerly, 524 S.E.2d 837, 838 (S.C. 1999)
- Nivens v. Gilchrist, 444 F.3d 237, 241, 247 (4th Cir. 2006)
- Heck v. Humphrey, 512 U.S. 477 (1994)
- Ballenger v. Owens, 352 F.3d 842, 846 (4th Cir. 2003)
- Bardes v. Magera, No. 2:08-cv-487-PMD-RSC, 2009 WL 3163547, at *27 (D.S.C. Sept. 30, 2009), aff'd, 403 F. App'x 862 (4th Cir. 2010)
- Benzing v. North Carolina, No. 3:17-CV-000619-KDB-DCK, 2020 WL 3439558, at *5 (W.D.N.C. June 23, 2020)
- Monell v. Department of Social Services, 436 U.S. 658 (1978)
- Washington v. Housing Authority of the City of Columbia, 58 F.4th 170, 182 (4th Cir. 2023)
- Carter v. Morris, 164 F.3d 215, 218 (4th Cir. 1999)
- Wilkins v. Gaddy, 559 U.S. 34 (2010)
- Shaw v. Stroud, 13 F.3d 791, 798–99 (4th Cir. 1994)
- Florida v. Jardines, 569 U.S. 1, 8 (2013)
- Edens v. Kennedy, 112 F. App'x 870, 875 (4th Cir. 2004)
- United States v. Jones, 565 U.S. 400, 408 n.5 (2012)
- Norton v. City of Whiteville, No. 7:16-CV-300-BO, 2017 WL 912018, at *2 (E.D.N.C. Mar. 7, 2017)
- Anderson v. Caldwell County Sheriff's Office, 524 F. App'x 854, 862 (4th Cir. 2013)
- Waring v. Kraft, No. 2:23-cv-5453-RMG, 2025 WL 357744, at *6 (D.S.C. Jan. 31, 2025)
- Suarez Corp. Industries v. McGraw, 202 F.3d 676, 686 (4th Cir. 2000)
- Constantine v. Rectors & Visitors of George Mason University, 411 F.3d 474, 499 (4th Cir. 2005)

- Tucker v. Price, No. 4:22-cv-1861-MGL-MHC, 2023 WL 10449206, at *1 (D.S.C. Jan. 24, 2023)

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