

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Charles Patrick Wilson v. Board of County Commissioners of San Juan County, et al.

No. 24-cv-265 JCH/KRS · No. 24-cv-265 JCH/KRS · Decided December 11, 2025

SUMMARY

The United States District Court for the District of New Mexico dismissed Plaintiff Charles Patrick Wilson’s federal civil-rights claims after he failed to file an amended complaint addressing deficiencies identified in the Court’s screening ruling. The Court dismissed the 42 U.S.C. § 1983 claims with prejudice for failure to state a cognizable claim and declined supplemental jurisdiction over any state-law claims, dismissing those claims without prejudice. The order directed that a separate judgment closing the case be entered.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	December 11, 2025
DOCKET	24-cv-265 JCH/KRS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action in which the court previously dismissed the original complaint without prejudice, granted multiple extensions to amend, and then dismissed the federal claims with prejudice after Plaintiff failed to amend or otherwise respond.
STANDARD OF REVIEW	The court applied the screening and failure-to-state-a-claim standards under 28 U.S.C. § 1915A, 28 U.S.C. § 1915(e), and Federal Rule of Civil Procedure 12(b)(6), and reviewed whether it should exercise supplemental jurisdiction over the state-law claims.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a federal district court

TOPICS

- section 1983
- motions to dismiss
- prisoners rights
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should dismiss the federal claims after Plaintiff failed to amend a complaint previously found not to state a cognizable claim under the Constitution or 42 U.S.C. § 1983.
2. Whether the court should exercise supplemental jurisdiction over the state-law claims after dismissal of all federal claims.

HOLDINGS

1. The federal § 1983 claims in the original complaint must be dismissed with prejudice for failure to state a cognizable claim under 28 U.S.C. § 1915A and Federal Rule of Civil Procedure 12(b)(6), where Plaintiff failed to timely amend after being given an opportunity and warned of the consequences.
2. The court declined to exercise supplemental jurisdiction over the state-law claims and dismissed them without prejudice because no federal claims remained.

KEY QUOTATIONS

“The Court declines to exercise supplemental Jurisdiction over any state law claims in the original Complaint (Doc. 1); such state law claims are therefore DISMISSED without prejudice; and the Court will enter a separate judgment closing the civil case.” (at 4)

FACTUAL BACKGROUND

Plaintiff, who was incarcerated when he initiated the federal proceeding, filed pro se after his attorney withdrew from a related state case. His federal complaint identified the same defendants as the state complaint but did not itself state claims or grounds for relief, while the attached state complaint alleged that police officers injured him during a November 1, 2021 arrest and that he was later attacked by another detainee in the county detention center booking area. The attached state complaint asserted battery and negligent operation of a building under the New Mexico Tort Claims Act.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint that largely incorporated an earlier New Mexico state-court complaint and did not clearly assert federal claims or grounds for relief. The court screened the complaint under 28 U.S.C. § 1915A, found that it failed to state a cognizable constitutional or § 1983 claim, dismissed it without prejudice, and invited amendment. After granting two extensions, the court set a final amendment deadline, which Plaintiff missed. The court dismissed the federal claims with prejudice and declined supplemental jurisdiction over any state-law claims, dismissing those claims without prejudice.

DISPOSITION

dismissed

CASES CITED

- United States v. Smalls, 605 F.3d 765, 768 n.2 (10th Cir. 2010)
- In re Syngenta AG MIR 162 Corn Litig., 61 F.4th 1126, 1170 (10th Cir. 2023)
- Firstenberg v. City of Santa Fe, N.M., 696 F.3d 1018, 1023 (10th Cir. 2012)
- Trask v. Franco, 446 F.3d 1036, 1046 (10th Cir. 2006)
- Reynoldson v. Shillinger, 907 F.2d 124, 126 (10th Cir. 1990)
- Novotny v. OSL Retail Servs. Corp., 2023 WL 3914017, at *1 (10th Cir. June 9, 2023)
- Bauchman v. W. High Sch., 132 F.3d 542, 549 (10th Cir. 1997)

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