

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Leticia Roberts and Calvin Sayers v. Tony Thompson, in his official capacity as Black Hawk County Sheriff, and Black Hawk County

Roberts v. Thompson · No. 25-1475 · Decided May 20, 2026

SUMMARY

The Eighth Circuit held that former Black Hawk County jail inmates plausibly alleged standing and a Fourteenth Amendment due process claim based on the County’s alleged practice of compelling inmates to sign confessions of judgment for jail fees. The court concluded that the alleged injuries were traceable to the confession-of-judgment policy and potentially redressable through damages and injunctive or declaratory relief. It vacated the dismissal of the due process claim and remanded for further proceedings.

CASE DETAILS

COURT	United States Court of Appeals for the Eighth Circuit
WRITING FOR THE COURT	Gruender; Loken; Grasz
JURISDICTION	United States Court of Appeals for the Eighth Circuit
DECIDED	May 20, 2026
DOCKET	25-1475
DISPOSITION	vacated
PROCEDURAL POSTURE	Plaintiffs appealed the dismissal of their 42 U.S.C. § 1983 due process claim for lack of standing and failure to state a claim, as well as the denial of leave to amend.
STANDARD OF REVIEW	Standing and dismissal for failure to state a claim were reviewed de novo. On the facial standing challenge and Rule 12(b)(6) review, the court accepted well-pleaded allegations as true, drew reasonable inferences in plaintiffs' favor, and considered only materials embraced by the pleadings.
PRECEDENTIAL VALUE	published
PARTIES	Leticia Roberts, Calvin Sayers v. Tony Thompson, in his official capacity as Black Hawk County Sheriff, Black Hawk County

TOPICS

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standing

motions to dismiss

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QUESTIONS PRESENTED

1. Whether Roberts and Sayers plausibly alleged injury in fact, traceability, and redressability sufficient to establish Article III standing for damages, declaratory relief, and injunctive relief.
2. Whether the first amended complaint plausibly alleged a Fourteenth Amendment due process deprivation based on the County's compelled confessions of judgment and retention or collection of jail-fee payments.
3. Whether the Eighth Circuit should decide the constitutional adequacy of the confession-of-judgment procedure or the plaintiffs' motion for leave to amend.

HOLDINGS

1. Plaintiffs plausibly alleged an injury in fact, traceable to the County's confession-of-judgment policy and redressable through damages because deprivation of a protected property interest without due process constitutes an injury in fact, and the alleged payments and retained money flowed from the challenged procedure.
2. Plaintiffs plausibly alleged standing to seek declaratory and injunctive relief because the County's allegedly unconstitutional policy remained in effect and the confessions remained in its possession, creating a real and immediate threat of renewed injury.
3. The first amended complaint plausibly alleged that the County deprived plaintiffs of property without due process; the district court erred in concluding that plaintiffs' payments were voluntary and that the County therefore caused no deprivation.
4. The court declined to decide whether confessions of judgment provide constitutionally adequate process because the district court had not ruled on that issue and the parties had not adequately developed it on appeal.

KEY QUOTATIONS

“The irreducible constitutional minimum of standing is that a plaintiff show (1) an injury-in-fact that (2) is fairly traceable to the challenged action of the defendant and (3) is likely to be redressed by a favorable decision in court.” (at 5)

“The injury Roberts and Sayers suffered will recur if the County uses the confessions of judgment to collect more money by, for example, filing the confessions.” (at 7)

“Determining the adequacy of the process is generally a merits question, even if a plaintiff does not use the process provided.” (at 9)

FACTUAL BACKGROUND

Black Hawk County charged jail inmates daily incarceration fees and a booking fee and required released inmates to sign confessions of judgment for unpaid amounts. The forms authorized the County to retain money seized from inmates and provided for monthly payments, with possible filing of the confessions for automatic judgment and execution without judicial review. Roberts alleged that she signed under compulsion, made small monthly payments to avoid further enforcement, and was subjected to collection efforts; Sayers alleged that he signed because he believed he had no choice and that the County retained \$75 seized from him.

PROCEDURAL HISTORY

Roberts and Sayers filed a § 1983 action alleging that Black Hawk County and Sheriff Tony Thompson deprived them of property without due process by compelling jail inmates to sign confessions of judgment for jail fees. The district court dismissed the first amended complaint for lack of standing and alternatively concluded that the alleged payments were voluntary and therefore did not state a due process claim; it denied a preliminary injunction as moot and denied leave to amend. The Eighth Circuit vacated the dismissal of the due process claim and remanded, declining to reach the motion for leave to amend.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Vacate the dismissal of the due process claim in the first amended complaint and remand for further proceedings consistent with the opinion. The district court may address remaining issues concerning the sufficiency of the complaint, including the constitutional adequacy of the confession-of-judgment procedure.

CASES CITED

- Kelly v. City of Omaha, 813 F.3d 1070, 1074-75 (8th Cir. 2016)
- State v. Abrahamson, 696 N.W.2d 589, 593 (Iowa 2005)
- Carlsen v. GameStop, Inc., 833 F.3d 903, 908-10 (8th Cir. 2016)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 560-61 (1992)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- American Farm Bureau Federation v. EPA, 836 F.3d 963, 968 (8th Cir. 2016)
- Friends of the Earth, Inc. v. Laidlaw Environmental Services (TOC), Inc., 528 U.S. 167, 185 (2000)
- Hughes v. City of Cedar Rapids, 840 F.3d 987, 992-94 (8th Cir. 2016)
- Mickelson v. County of Ramsey, 823 F.3d 918, 923-24 (8th Cir. 2016)
- Carey v. Piphus, 435 U.S. 247, 266 (1978)
- Webb ex rel. K.S. v. Smith, 936 F.3d 808, 814-15 (8th Cir. 2019)
- Frost v. Sioux City, 920 F.3d 1158, 1161-62 (8th Cir. 2019)
- Iowa Migrant Movement for Justice v. Bird, 157 F.4th 904, 915 (8th Cir. 2025)
- Avalos v. Baca, 596 F.3d 583, 589-91 (9th Cir. 2010)

- **Murphy v. Aurora Loan Services, LLC**, 699 F.3d 1027, 1033-34 (8th Cir. 2012)

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