

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

James C. Strader v. City Confidential, et al.

Strader v. City Confidential · No. 25-3260-JWL · Decided March 17, 2026

SUMMARY

The United States District Court for the District of Kansas dismissed James C. Strader’s amended pro se complaint arising from a documentary allegedly portraying him as a child molester and from challenges to his state-court convictions. The court dismissed the documentary-related claims with prejudice for failure to allege action under color of state law and dismissed the remaining claims without prejudice for failure to comply with Federal Rule of Civil Procedure 8. The court also explained that habeas corpus, rather than § 1983, is the proper vehicle for seeking release from custody and that damages claims challenging allegedly invalid convictions may be barred by Heck v. Humphrey.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	John W. Lungstrum
JURISDICTION	United States District Court for the District of Kansas
DECIDED	March 17, 2026
DOCKET	25-3260-JWL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se state prisoner civil-rights action under 42 U.S.C. § 1983 dismissed at the mandatory screening stage after the amended complaint failed to state a plausible federal claim and failed to comply with Federal Rule of Civil Procedure 8.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915A; the pro se complaint was liberally construed, well-pleaded allegations were accepted as true, and dismissal was required if the pleading was frivolous, malicious, failed to state a claim, or sought relief from an immune defendant.
PRECEDENTIAL VALUE	unpublished

TOPICS

- section 1983
- prisoners rights
- pleadings
- civil procedure
- post-conviction relief

PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner litigation

post-conviction relief

QUESTIONS PRESENTED

1. Whether the amended complaint stated a plausible claim under 42 U.S.C. § 1983 against the defendants associated with the documentary.
2. Whether claims challenging errors in Strader's state criminal proceedings could proceed under § 1983 when he sought release from custody or damages relating to allegedly invalid convictions.
3. Whether the amended complaint complied with Federal Rule of Civil Procedure 8.
4. Whether the court should permit further amendment.

HOLDINGS

1. The documentary-related claims failed to state a plausible § 1983 claim because the amended complaint did not plausibly allege that any defendant associated with the documentary acted under color of state law or violated a federal or constitutional right.
2. A state prisoner's federal-court claim seeking immediate or speedier release must be brought through habeas corpus rather than § 1983, and a damages claim that would necessarily imply the invalidity of an existing conviction is barred unless the conviction has been invalidated.
3. The amended complaint violated Rule 8 because it did not provide a short and plain, intelligible statement connecting the claims, defendants, supporting facts, and requested relief.
4. The court declined to allow a second amended complaint because Strader continued to assert deficient claims after having been advised of the deficiencies.

KEY QUOTATIONS

“A petition for habeas corpus relief is a state prisoner's sole remedy in federal court for a claim of entitlement to immediate or speedier release.” (Discussion, Counts I-II)

“Even liberally construed, the amended complaint would not give opposing parties fair notice of the basis of the claim or claims against them.” (Discussion, Rule 8 analysis)

FACTUAL BACKGROUND

Strader, a Kansas state prisoner, alleged that a City Confidential documentary used his name and a photograph allegedly depicting him while falsely portraying him as a child molester or sexual predator. He also alleged constitutional and tort-related errors in his underlying state criminal proceedings, including claims concerning evidentiary rules, an allegedly unfair trial, and his asserted innocence. The amended complaint named numerous state, correctional, media, and private defendants and sought release from custody, vacatur of his convictions, clemency, damages, and other relief.

PROCEDURAL HISTORY

Strader filed the action on December 3, 2025, and paid the filing fee. After screening the initial complaint, the court issued a memorandum and order to show cause identifying deficiencies, including failure to plead state action, a federal or constitutional violation, and a basis for supplemental jurisdiction. The court permitted an amended complaint, but dismissed Counts III through VI with prejudice and dismissed Counts I and II and any other intended claims without prejudice for failure to comply with Rule 8, declining to permit further amendment.

DISPOSITION

dismissed

CASES CITED

- *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388, 397 (1971)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Anderson v. Blake*, 469 F.3d 910, 913 (10th Cir. 2006)
- *Whitney v. New Mexico*, 113 F.3d 1170, 1173-74 (10th Cir. 1997)
- *West v. Atkins*, 487 U.S. 42, 48-49 (1988)
- *Northington v. Jackson*, 973 F.2d 1518, 1523 (10th Cir. 1992)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555, 558, 570 (2007)
- *Hall v. Bellmon*, 935 F.2d 1106, 1110 (10th Cir. 1991)
- *Smith v. United States*, 561 F.3d 1090, 1098 (10th Cir. 2009)
- *Robbins v. Okla.*, 519 F.3d 1242, 1247 (10th Cir. 2008)
- *Preiser v. Rodriguez*, 411 U.S. 475, 499 (1973)
- *Boutwell v. Keating*, 399 F.3d 1203, 1209 (10th Cir. 2005)
- *Strader v. Cheeks*, 2022 WL 2274137, *2 (D. Kan. June 23, 2022)
- *Heck v. Humphrey*, 512 U.S. 477 (1994)
- *Johnson v. Spencer*, 950 F.3d 680, 692 (10th Cir. 2020)
- *Strader v. Werholtz*, 2019 WL 4917899, *1 (D. Kan. Oct. 4, 2019)
- *Monument Builders of Greater Kan. City, Inc. v. Am. Cemetery Ass'n of Kan.*, 891 F.2d 1473, 1480 (10th Cir. 1990)
- *Perington Wholesale, Inc. v. Burger King Corp.*, 631 F.2d 1369, 1371 (10th Cir. 1980)
- *George v. Smith*, 507 F.3d 605, 607 (7th Cir. 2007)
- *Kay v. Bemis*, 500 F.3d 1214, 1218 (10th Cir. 2007)
- *McNeil v. United States*, 508 U.S. 106, 113 (1993)
- *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 512-513 (2002)
- *Chavez v. Huerfano Cnty.*, 195 F. App'x 728, 729-30 (10th Cir. Sept. 1, 2006)
- *Baker v. City of Loveland*, 686 F. App'x 691, 620 (10th Cir. 2017)
- *Mann v. Boatright*, 477 F.3d 1140, 1148 (10th Cir. 2007)

- Blazer v. Black, 196 F.2d 139, 144 (10th Cir. 1952)
- Knox v. First Sec. Bank of Utah, 196 F.2d 112, 117 (10th Cir. 1952)
- Nasious v. Two Unknown B.I.C.E. Agents, 492 F.3d 1158, 1162 n.3 (10th Cir. 2007)
- Triplett v. U.S. Dept. of Defense, 2011 WL 1113551 (D. Kan. March 24, 2011)

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