

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

Paul Joseph Ankuda v. Commonwealth of Massachusetts

Ankuda · No. 25-11697-MJJ · Decided December 18, 2025

SUMMARY

The United States District Court for the District of Massachusetts dismissed without prejudice a pro se plaintiff’s civil action against the Commonwealth of Massachusetts. The court concluded that, to the extent the complaint challenged an ongoing state criminal prosecution or confinement, abstention under *Younger v. Harris* was required, and noted that the plaintiff had neither paid the filing fee nor sought in forma pauperis status.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Myong J. Joun
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	December 18, 2025
DOCKET	25-11697-MJJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed a civil complaint challenging an ongoing state criminal prosecution and his confinement. The district court sua sponte dismissed the action without prejudice.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- subject matter jurisdiction
- civil procedure
- federalism
- criminal procedure

PRACTICE AREAS

- civil procedure
- federal jurisdiction
- federalism
- criminal procedure

QUESTIONS PRESENTED

- Whether the federal district court should exercise jurisdiction over claims challenging an ongoing state criminal prosecution and confinement.

2. Whether the action should be dismissed without prejudice where the plaintiff had not paid the filing fee or sought leave to proceed in forma pauperis.

HOLDINGS

1. The district court must refrain from exercising jurisdiction over claims challenging the validity of pending state criminal proceedings in order to avoid interfering with those proceedings.

KEY QUOTATIONS

“To the extent Mr. Ankuda is challenging the validity of the criminal prosecution against him, the Court must refrain from exercising jurisdiction over his claims to avoid interfering with the state proceedings.”

FACTUAL BACKGROUND

Ankuda, apparently a pretrial detainee, filed a pro se civil complaint challenging a pending Massachusetts criminal prosecution and the fact of his confinement. His complaint sought to have the United States and federal government leave him alone, and he had neither paid the filing fee nor moved to proceed in forma pauperis.

PROCEDURAL HISTORY

Paul Joseph Ankuda filed a civil complaint against the Commonwealth of Massachusetts. He did not pay the filing fee or submit a motion to proceed in forma pauperis. The district court determined that the complaint appeared to challenge pending state criminal proceedings and dismissed the action without prejudice to avoid interference with those proceedings.

DISPOSITION

dismissed

CASES CITED

- Sprint Commc'ns, Inc. v. Jacobs, 571 U.S. 69, 72 (2013)
- Younger v. Harris, 401 U.S. 37 (1971)