

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Tyease Williams v. City of Springfield, et al.

Williams · No. 1:25-cv-294 · Decided March 11, 2026

SUMMARY

The United States District Court for the Southern District of Ohio adopted a magistrate judge’s Report and Recommendation and dismissed Tyease Williams’s in forma pauperis complaint. The court overruled Williams’s untimely objection and held that several defendants could not be liable under 42 U.S.C. § 1983, while the claims against the City of Springfield and certain claims against Trooper D.L. Webb were inadequately pleaded. Federal claims against several defendants were dismissed with prejudice, and other federal and state-law claims were dismissed without prejudice.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Susan J. Dlott
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	March 11, 2026
DOCKET	1:25-cv-294
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff proceeding in forma pauperis filed constitutional and state-law claims arising from an allegedly wrongful arrest. A magistrate judge recommended dismissal following screening under 28 U.S.C. § 1915(e)(2), and the district court adopted the recommendation, overruled plaintiff's untimely objection, and dismissed the complaint.
STANDARD OF REVIEW	A timely objection to a magistrate judge's recommendation on a dispositive matter receives de novo review, but a district court need not conduct de novo review of frivolous, conclusive, or general objections. The complaint was screened under the failure-to-state-a-claim standard applicable to in forma pauperis actions.
PRECEDENTIAL VALUE	unpublished

PARTIES

Tyease Williams v. City of Springfield, Lawrence County Prosecutor's Office, Lawrence County Municipal Clerk, Ohio State Highway Patrol, Lockland Police Department, D.L. Webb, Janiaya Canty

TOPICS

section 1983

municipal liability

civil procedure

pleadings

subject matter jurisdiction

PRACTICE AREAS

civil procedure

civil rights

constitutional law

municipal law

QUESTIONS PRESENTED

1. Whether the district court could adopt the magistrate judge's Report and Recommendation without considering Williams's untimely objection.
2. Whether the complaint stated a claim under 42 U.S.C. § 1983 against the named governmental entities, Trooper Webb, and Janiaya Canty.
3. Whether the complaint stated a municipal-liability claim against the City of Springfield.
4. Whether the court should exercise subject matter jurisdiction over Williams's state-law claims after dismissing the federal claims.
5. Whether Williams's proposed amended complaint should be considered after she failed to timely file a compliant amendment.

HOLDINGS

1. Because Williams filed her objection more than five weeks after the objection deadline, the district court could adopt the Report and Recommendation without considering the objection.
2. The complaint failed to state constitutional claims under 42 U.S.C. § 1983 against the Lawrence County Prosecutor's Office, Lawrence County Municipal Clerk, Ohio State Highway Patrol, Lockland Police Department, Trooper Webb in his official capacity, and Canty.
3. Williams failed to state a municipal-liability claim against the City of Springfield.
4. The federal claims against Trooper Webb in his individual capacity were conclusory and failed to state a claim; they were dismissed without prejudice.
5. After dismissing the federal claims, the court declined to exercise subject matter jurisdiction over the state-law claims and dismissed them without prejudice.
6. The court would not consider Williams's proposed amended complaint because she failed to timely file an amended complaint complying with the Federal Rules of Civil Procedure and the magistrate judge's order.

KEY QUOTATIONS

“A complaint filed by a pro se plaintiff must be “liberally construed” and “held to less stringent standards than formal pleadings drafted by lawyers.”” (Standards of Law, Section II.A)

“Accordingly, the Report and Recommendation (Doc. 4) is ADOPTED.” (Conclusion, Section IV)

FACTUAL BACKGROUND

Williams alleged that a Lawrence County, Ohio, warrant issued in 2015 based on an allegedly false identity-fraud accusation and inadequate investigation. Although the charges were dismissed and the warrant was recalled on May 15, 2023, Williams alleged that an administrative error caused the warrant to remain active, resulting in her arrest on May 26, 2023. She also alleged emotional harm and damage or theft of property during the arrest. The court noted that the complaint did not adequately connect the City of Springfield to the events and pleaded the individual-capacity federal claims against Trooper Webb only conclusorily.

PROCEDURAL HISTORY

Williams filed the complaint on April 24, 2025. The magistrate judge issued a Report and Recommendation on September 8, 2025, recommending dismissal for failure to state a claim. Williams filed an untimely objection and a motion for leave to amend out of time; after she failed to comply with Rule 11(a)'s signature requirement, the motion and proposed amended complaint were stricken. The district court adopted the Report and Recommendation, overruled the objection, and dismissed the claims with prejudice in part and without prejudice in part.

DISPOSITION

dismissed

CASES CITED

- Denton v. Hernandez, 504 U.S. 25, 31–32 (1992)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Hill v. Lappin, 630 F.3d 468, 470–471 (6th Cir. 2010)
- Thomas v. Arn, 474 U.S. 140, 152 (1985)
- Roane v. Warden of Corr. Reception Ctr., No. 2:22-CV-2768, 2022 WL 16535903, at *1 (S.D. Ohio Oct. 28, 2022)
- Lassiter v. Dullaghan, No. 1:10-CV-010, 2011 WL 110259, at *1 (S.D. Ohio Jan. 13, 2011)
- Baker v. Peterson, 67 F. App'x 308, 310 (6th Cir. 2003)
- Mira v. Marshall, 806 F.2d 636, 637 (6th Cir. 1986) (per curiam)
- Lavado v. Keohane, 992 F.2d 601, 605–606 (6th Cir. 1993)

