

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Simpkins v. State of Tennessee

Simpkins · No. Civil Action No. 25-04566 (AHA) · Decided January 14, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed without prejudice a pro se complaint brought by David M. Simpkins and Sally E. Simpkins against Tennessee and various state and federal actors. The court held that the complaint failed to satisfy Federal Rule of Civil Procedure 8 and that the asserted claims appeared to seek impermissible review of state-court and federal district-court proceedings or interference with ongoing state criminal proceedings under the Rooker-Feldman and Younger doctrines.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amir H. Ali
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 14, 2026
DOCKET	Civil Action No. 25-04566 (AHA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs filed a pro se complaint seeking relief related to state-court proceedings, a federal district-court proceeding, and an ongoing Tennessee state criminal proceeding. The District of Columbia district court dismissed the complaint in its entirety without prejudice.
STANDARD OF REVIEW	The complaint was evaluated in light of all filings, with extra leeway afforded to the unrepresented plaintiffs; dismissal was authorized for failure to comply with Rule 8 and required where subject-matter jurisdiction was lacking.
PRECEDENTIAL VALUE	Published memorandum opinion
PARTIES	David M. Simpkins, Sally E. Simpkins v. State of Tennessee, Various state and federal actors

TOPICS

- pleadings
- subject matter jurisdiction
- civil procedure
- constitutional law

PRACTICE AREAS

civil procedure

federal jurisdiction

constitutional law

QUESTIONS PRESENTED

1. Whether the complaint satisfied Federal Rule of Civil Procedure 8's requirement of a short and plain statement showing entitlement to relief.
2. Whether the District Court for the District of Columbia had subject-matter jurisdiction to review or provide relief from the Tennessee state-court proceedings.
3. Whether the court had jurisdiction to review proceedings or filings in another federal district court.
4. Whether the court could enjoin the ongoing Tennessee state criminal proceeding under the Younger abstention doctrine.

HOLDINGS

1. The complaint failed to comply with Rule 8 because its cursory and often unidentified allegations did not give defendants fair notice of the claims and the grounds on which they rested.
2. The court lacked subject-matter jurisdiction over claims that sought review of, or were functionally equivalent to an appeal from, the Tennessee state-court proceedings.
3. The court lacked jurisdiction to review decisions or proceedings of the United States District Court for the Middle District of Tennessee.
4. The court could not enjoin the pending Tennessee state criminal proceeding because plaintiffs showed no extraordinary circumstances warranting an exception to Younger abstention.

KEY QUOTATIONS

"The federal rules require a complaint to contain "a short and plain statement of the claim showing that the pleader is entitled to relief."" (Opinion at 2)

"Under the Rooker-Feldman doctrine, federal district courts may not hear "cases that amount to the functional equivalent of an appeal from a state court."" (Opinion at 4)

"Under the Younger doctrine, "federal courts should not enjoin pending state criminal proceedings absent extraordinary circumstances."" (Opinion at 5)

FACTUAL BACKGROUND

Plaintiffs alleged claims arising from a Tennessee construction dispute, a dismissed case in the Middle District of Tennessee, and a Tennessee state criminal proceeding involving David Simpkins. Their complaint appeared to assert 183 counts in a table identifying alleged actors, laws violated, and unlawful acts, but many counts did not identify a specific defendant or provide factual and legal detail. Plaintiffs also attached numerous documents from other proceedings and sought relief that appeared to require review of state or federal court actions or interference with an ongoing state criminal case.

PROCEDURAL HISTORY

Plaintiffs previously litigated construction-related claims in Tennessee chancery court; after an appeal and remand, the chancery court apparently dismissed the case on remand. Plaintiffs also referenced a dismissed action in the Middle District of Tennessee and a Tennessee state criminal proceeding. They then filed this action in the District Court for the District of Columbia, which dismissed the complaint for failure to satisfy Federal Rule of Civil Procedure 8 and because the requested review or interference with other courts' proceedings was beyond the court's authority.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Ciralsky v. CIA, 355 F.3d 661, 669 (D.C. Cir. 2004)
- Dali v. Walter Reed Nat'l Mil. Med. Ctr., No. 24-cv-3313, 2025 WL 326575, at *1 (D.D.C. Jan. 29, 2025)
- Ho v. Garland, 106 F.4th 247, 250 (D.C. Cir. 2024)
- Brown v. Whole Foods Mkt. Grp., Inc., 789 F.3d 146, 152 (D.C. Cir. 2015)
- Jones v. Horne, 634 F.3d 588, 596 (D.C. Cir. 2011)
- Atherton v. District of Columbia, 567 F.3d 672, 681–82 (D.C. Cir. 2009)
- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)
- Auster v. Ghana Airways Ltd., 514 F.3d 44, 48 (D.C. Cir. 2008)
- Gray v. Poole, 275 F.3d 1113, 1119 (D.C. Cir. 2002)
- Rooker v. Fid. Trust Co., 263 U.S. 413 (1923)
- D.C. Ct. of Appeals v. Feldman, 460 U.S. 462 (1983)
- Stanton v. D.C. Ct. of Appeals, 127 F.3d 72, 75 (D.C. Cir. 1997)
- Johnson v. De Grandy, 512 U.S. 997, 1005–1006 (1994)
- Nichols v. Vilsack, No. 13-cv-01502, 2015 WL 9581799, at *1 (D.D.C. Dec. 30, 2015)
- Klayman v. Rao, 49 F.4th 550, 552 (D.C. Cir. 2022)
- JMM Corp. v. District of Columbia, 378 F.3d 1117, 1126 (D.C. Cir. 2004)
- Younger v. Harris, 401 U.S. 37 (1971)

OPINION

Simpkins v. State of Tennessee

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

DAVID M. SIMPKINS, et al., Plaintiffs, Civil Action No. 25-04566 (AHA) v. STATE OF TENNESSEE, et al., Defendants. Memorandum Opinion David M. Simpkins and Sally E.

Simpkins have filed a complaint indicating their intent to sue various state and federal actors, which appear to include the State of Tennessee, courts and judicial officers in Tennessee, and law enforcement agencies. The complaint appears to assert claims related to three lawsuits: one the plaintiffs brought in state court, against the builders of their home; one the plaintiffs brought in a Tennessee federal district court; and a state criminal prosecution against David Simpkins. For the reasons below, the court dismisses the complaint in its entirety. I. Background Based on the pleadings filed, it appears the plaintiffs sued a construction company in Williamson County Chancery Court, in Tennessee, asserting claims related to the construction of their home. ECF No. 1-4 at 1–2. After the chancery court dismissed the case, the plaintiffs appealed to the Tennessee Court of Appeals, which affirmed the dismissal of some claims, vacated the dismissal of others, and remanded the surviving claims. *Id.* at 1. The chancery court appears to have dismissed the case on remand. See ECF No. 1 ¶ 23; see also ECF No. 4-1. The complaint also references a case that the plaintiffs brought in the U.S. District Court for the Middle District of Tennessee, which appears to have been dismissed. See ECF No. 1 ¶¶ 15–18; ECF No. 4. The nature of that lawsuit is unclear from the pleadings. Finally, the complaint references a Tennessee state criminal proceeding against David Simpkins. See ECF No. 1-1 at 9–14. The nature of that proceeding is also unclear from the complaint, but some of the plaintiffs’ filings suggest it may stem from David Simpkins’ alleged violation of a protective order. See ECF Nos. 1-12, 1-13. II. Discussion The court concludes that the plaintiffs’ case must be dismissed for failure to satisfy Federal Rule of Civil Procedure 8 and because, as far as the court can tell, the plaintiffs seek review of the proceedings of other courts, which this court cannot do. The federal rules require a complaint to contain “a short and plain statement of the claim showing that the pleader is entitled to relief.” Fed. R. Civ. P. 8(a)(2). This “does not require ‘detailed factual allegations,’ but it demands more than an unadorned, the-defendant-unlawfully- harmed-me accusation.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)). This ensures the defendant has “notice of what the claim is and the grounds upon which it rests.” *Twombly*, 550 U.S. at 555 (cleaned up). A court may dismiss a complaint that fails to meet these requirements upon motion or on its own accord. See Fed. R. Civ. P. 41(b); see also *Ciralsky v. CIA*, 355 F.3d 661, 669 (D.C. Cir. 2004) (“Rule 41(b) authorizes the court to dismiss either a claim or an action because of the plaintiff’s failure to comply with the Federal Rules.”); *Dali v. Walter Reed Nat’l Mil. Med. Ctr.*, No. 24-cv-3313, 2025 WL 326575, at

*1 (D.D.C. Jan. 29, 2025) (observing that dismissals under Rule 8(a) “may be ordered on motion or sua sponte by the court”). In cases like this involving an unrepresented or “pro se” litigant, the court is careful to give extra leeway. The court evaluates the complaint “in light of all filings.” *Ho v. Garland*, 106 F.4th 2 47, 50 (D.C. Cir. 2024) (quotation marks omitted) (quoting *Brown v. Whole Foods Mkt. Grp., Inc.*, 789 F.3d 146, 152 (D.C. Cir. 2015)). Of course, an unrepresented plaintiff still “must plead factual matter that permits the court to infer more than the mere possibility of misconduct.” *Jones v. Horne*, 634 F.3d 588, 596 (D.C. Cir. 2011) (quotation marks

omitted) (quoting *Atherton v. District of Columbia*, 567 F.3d 672, 681–82 (D.C. Cir. 2009)). While “detailed factual allegations” are not necessary, the plaintiff must furnish “more than labels and conclusions” or “a formulaic recitation of the elements of a cause of action.” *Twombly*, 550 U.S. at 555. The plaintiffs’ allegations fail to provide the defendants with notice of the claims against them. The complaint appears to assert 183 counts against the defendants, attaching a table that simply lists the “Actor(s),” the “Law Violated,” and the alleged “Unlawful Act” for each count. See ECF No. 1-3. Each count provides minimal information—for example, count five states that “Law Enforcement” violated the “Fourth Amendment” by committing an “Unlawful transport to jail,” with no further explanation. *Id.* at 1. These cursory assertions, which do not even identify a specific defendant, fail to give any defendant “notice of what the claim is and the grounds upon which it rests.” Some sections of the complaint provide slightly more detailed descriptions—stating, for example, that on “September 22, 2022, Appellate Court Clerk Elizabeth admitted on a recorded call that the Mandate was intentionally withheld to coordinate with opposing counsel’s filings.” ECF No. 1 ¶ 20. But even these allegations, most of which are still too vague to give a clear account of what happened, contain no meaningful explanation of any legal basis for relief. The plaintiffs’ complaint accordingly fails to provide the “short and plain statement” required by Rule 8.1

1 The plaintiffs attach numerous documents to their complaint including judgments of other courts, a complaint submitted to federal law enforcement, and filings in other proceedings. See 3 The plaintiffs’ claims are also problematic because “[f]ederal courts are courts of limited jurisdiction.” *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). They may hear only those cases authorized by an act of Congress or the Constitution. *Id.* A party seeking relief in the district court must at least plead facts that bring the suit within the court’s jurisdiction. See Fed. R. Civ. P. 8(a)(1). And “[w]hen a court lacks subject matter jurisdiction, it must dismiss the case.” *Auster v. Ghana Airways Ltd.*, 514 F.3d 44, 48 (D.C. Cir. 2008) (citing Fed. R. Civ. P. 12(h)(3)). Here, any possible claims that might be asserted by the complaint appear to seek review of other state or federal court proceedings. This court has neither subject matter jurisdiction to review such claims, nor the authority to interfere with such proceedings. First, to the extent the plaintiffs’ claims seek relief from decisions of the Tennessee chancery court, this court does not have subject matter jurisdiction to consider them. Under the Rooker-Feldman doctrine, federal district courts may not hear “cases that amount to the functional equivalent of an appeal from a state court.” *Gray v. Poole*, 275 F.3d 1113, 1119 (D.C. Cir. 2002); see also *Rooker v. Fid. Trust Co.*, 263 U.S. 413 (1923); *D.C. Ct. of Appeals v. Feldman*, 460 U.S. 462 (1983). This prevents federal courts from considering issues that are “so inextricably intertwined with a state court decision that the district court is in essence being called upon to review the state-court decision.” *Stanton v. D.C. Ct. of Appeals*, 127 F.3d 72, 75 (D.C. Cir. 1997) (quotation marks and citation omitted). Federal jurisdiction is barred even when the plaintiff claims “that the state judgment itself violates the [plaintiff’s] federal rights.” *Johnson v. De Grandy*, 512 ECF Nos. 1-4–1-18, 1-20. However, unexplained attachments cannot cure a complaint’s deficiencies. See *Nichols v.*

Vilsack, No. 13-cv-01502, 2015 WL 9581799, at *1 (D.D.C. Dec. 30, 2015) (observing that even in pro se cases, “courts are not responsible for hunting through the record in search of material potentially helpful to a party’s case,” and “where undifferentiated documents are submitted along with a complaint that is itself lacking in detail, asking the Court to comb through the attachments to discern the substance of the plaintiff’s claims . . . risks denying the defendant fair notice and an opportunity to respond to identifiable allegations of wrongdoing”). 4 U.S. 997, 1005–1006 (1994). Here, the complaint appears to request relief from an adverse judgment of the Tennessee chancery court, which the plaintiffs argue failed to follow the directives of the state appellate court. See ECF No. 1 ¶¶ 23–26; ECF No. 4-1. To the extent the plaintiffs’ claims ask this court to review the propriety of the chancery court’s decision (or the state appellate court’s decision), they are barred by Rooker-Feldman. Second, to the extent the plaintiffs’ claims seek review of proceedings in the U.S. District Court for the Middle District of Tennessee, this court does not have jurisdiction to consider them. “A federal district court lacks jurisdiction to review decisions of other federal courts.” *Klayman v. Rao*, 49 F.4th 550, 552 (D.C. Cir. 2022) (citation omitted). Here, a federal district court in Tennessee appears to have dismissed the plaintiffs’ case, yet the plaintiffs continued filing documents after that dismissal. See ECF No. 4; ECF No. 1-11. The complaint alleges these filings should be docketed and requests “cessation of all acts suppressing Plaintiffs’ access to courts.” ECF No. 1-1 at 14; see ECF No. 1 ¶¶ 15–18, 27–32. To the extent these claims ask this court to review actions of another federal district court, they are beyond this court’s jurisdiction. Finally, to the extent the plaintiffs ask this court to enjoin ongoing state criminal proceedings, this court lacks authority to do so. Under the Younger doctrine, “federal courts should not enjoin pending state criminal proceedings absent extraordinary circumstances.” *JMM Corp. v. District of Columbia*, 378 F.3d 1117, 1126 (D.C. Cir. 2004); see also *Younger v. Harris*, 401 U.S. 37 (1971). Here, the plaintiffs appear to challenge the basis of a criminal proceeding in the General Sessions Court in Tennessee and ask this court to “[e]njoin all criminal proceedings derived from void process and used to obstruct civil enforcement.” ECF No. 1 at 10; ECF No. 1-1 at 14. But the plaintiffs’ allegations provide no meaningful basis on which this court might take the extraordinary measure of enjoining a state criminal proceeding. 5 Because the complaint fails to comply with Rule 8 and the types of claims asserted appear to be beyond this court’s authority, the court dismisses the case in its entirety. III. Conclusion For these reasons, the plaintiffs’ complaint is dismissed without prejudice. A separate order accompanies this memorandum opinion.

AMIR H. ALI

United States District Judge Date: January 14, 2026 6