O’Neal v. James

Docket No.: 25-2741

Full decision: Click here to view the decision

Case Information

Court: U.S. Court of Appeals for the Second Circuit

Date Decided: September 22, 2026

Judges: Circuit Judge Walker, Circuit Judge Park, District Judge Halpern (sitting by designation)

Lower Court: U.S. District Court for the Eastern District of New York (Judge Morrison)

Parties and Attorneys

Plaintiff-Appellant: Blanche O’Neal, Pro Se

Defendant-Appellee: Letitia James; Represented By: Danny Yao Li, Barbara D. Underwood, Matthew W. Grieco

Defendants-Appellees: 23A Vernon LLC, Jay Markowitz; Represented By: Not stated

Defendant-Appellee: Stewart Knickerbocker; Represented By: Robert H. Brown, Amy Abbandondelo

Defendants-Appellees: Eric Gonzalez, Knickerbocker Title Company, Colie Gallman, Jr., Colie Gallman, 23A Vernon Holdings LLC, Estate of Lillian Hudson, Personal Representative of the Estate of Lillian Hudson, Kim Grate; Represented By: Not stated

Defendants: Supreme Court of the State of New York, County of Kings, Judge Edgar G. Walker; Represented By: Not stated

Overview

Issue: Whether federal claims challenging state property and criminal judgments could proceed despite jurisdictional limits, immunity, and deficient allegations.

Lower Court Held: The district court sua sponte dismissed the complaint as frivolous, finding jurisdiction lacking and many defendants immune.

What Was Overturned: The Second Circuit modified the judgment to dismiss claims outside federal subject-matter jurisdiction without prejudice and otherwise affirmed.

Why: The claims failed under jurisdictional and immunity doctrines or lacked sufficient allegations of state action or conspiracy, but jurisdictional dismissals could not be with prejudice.

Background

State civil and criminal proceedings resolved in 2021 determined that O'Neal's deed to Brooklyn property was void and resulted from criminal fraud. In 2025, she attempted to remove the civil action to a purported tribal court, then brought federal claims alleging violations of tribal sovereignty, constitutional rights, and conspiracy.

Lower Court Decision

The district court dismissed the complaint sua sponte as frivolous, relying on lack of jurisdiction and defendants' immunity. Its judgment dismissed with prejudice claims over which it lacked subject-matter jurisdiction.

Second Circuit Reversal

Reviewing jurisdiction de novo, the Second Circuit held that Rooker-Feldman [the doctrine barring federal district court review of state-court judgments] barred equitable relief undoing the quiet-title judgment. O'Neal abandoned her challenge to dismissal of equitable claims concerning her conviction, and her tribal-sovereignty arguments lacked merit. Sovereign immunity barred damages against the state court and official-capacity state defendants; judicial and prosecutorial immunity protected the individual state defendants. Private defendants were not state actors, and conclusory allegations did not establish conspiracy under the Racketeer Influenced and Corrupt Organizations Act (RICO) or the civil-rights statutes. The dismissal survived de novo review, making it unnecessary to decide whether sua sponte frivolousness dismissals receive that review or abuse-of-discretion review. The Second Circuit modified the jurisdictional dismissals to be without prejudice and affirmed as modified.

Legal Significance

This nonprecedential summary order reinforced the distinction between jurisdictional dismissals and merits dispositions: claims outside subject-matter jurisdiction must be dismissed without prejudice. It also illustrated that conclusory conspiracy allegations do not convert private participants in state litigation into state actors.

Key Takeaway

Separate jurisdictional grounds from merits and immunity defenses, and ensure that any jurisdictional dismissal is without prejudice.

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