

Dennis v. Sparks

449 U.S. 24 (1980)

Supreme Court of the United States

Issue: Bribed judge immune (but private co-conspirators liable)

Holding on Judicial Immunity

A judge who allegedly issued an injunction as the result of a bribe and corrupt conspiracy was still absolutely immune from § 1983 damages. However, the private parties who bribed/conspired with the judge were NOT immune and could be sued, because they acted under color of law.

Key Quotations (verbatim)

"[T]he judge was immune from liability in a § 1983 suit, whether or not the injunction had issued as the result of a corrupt conspiracy."

— Dennis v. Sparks, 449 U.S. 24, 26–27 (1980).

"[A] private party involved in such a conspiracy, even though not an official of the State, can be liable under § 1983. 'Private persons, jointly engaged with state officials in the prohibited action, are acting "under color" of law for purposes of the statute.'"

— Dennis v. Sparks, 449 U.S. 24, 27–28 (1980).

Note / Caveat: AMBIGUOUS / FITS BOTH CATEGORIES: The judge's own absolute immunity (upheld even for a bribed ruling) is a striking 'no accountability' holding; but the case is also cited for the accountability principle that private parties who corrupt a judge remain liable. Flagged per instructions rather than forced cleanly into one bucket.

Full opinion (authoritative source): <https://www.courtlistener.com/opinion/110353/dennis-v-sparks/>

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