

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Sabrina Franklin v. Stellantis Chrysler, UAW Solidarity House, Paul
Ludka, Joe Nue, and Peter Raith

Franklin · No. 25-cv-781-pp · Decided December 29, 2025

SUMMARY

The United States District Court for the Eastern District of Wisconsin screens Sabrina Franklin’s pro se Title VII complaint alleging race- and color-based discrimination arising from a delayed promotion and training process. The court dismisses the individual defendants because Title VII does not provide for individual liability and concludes that the complaint does not plausibly connect the alleged failure to promote to race or color discrimination. The court permits Franklin to file an amended complaint by January 30, 2026, or the case will be dismissed without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	December 29, 2025
DOCKET	25-cv-781-pp
DISPOSITION	other
PROCEDURAL POSTURE	The court screened the plaintiff’s fee-paid employment-discrimination complaint under 28 U.S.C. § 1915(e)(2) and determined that it failed to state a claim, while granting the plaintiff leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss a fee-paid complaint that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The pleading must satisfy Federal Rule of Civil Procedure 8(a)(2) and allege sufficient facts to make entitlement to relief plausible.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Sabrina Franklin v. Stellantis Chrysler, UAW Solidarity House, Paul Ludka, Joe Nue, Peter Raith

TOPICS

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PRACTICE AREAS

Employment discrimination

Civil procedure

Title VII

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible Title VII employment-discrimination claim against FCA US LLC and UAW Solidarity House.
2. Whether Paul Ludka, Joe Nue, and Peter Raith could be held individually liable under Title VII.
3. Whether the plaintiff should be permitted to amend the deficient complaint rather than have the action immediately dismissed.

HOLDINGS

1. Title VII does not provide for individual liability; only an employer may be held liable under Title VII. Accordingly, the claims against Paul Ludka, Joe Nue, and Peter Raith could not proceed under Title VII.
2. The complaint failed to state a plausible Title VII claim against FCA US LLC or UAW Solidarity House because it did not explain which entity controlled the position or promotion, how each defendant was involved, or why the failure to promote was connected to Franklin's race or color rather than another reason.
3. The complaint appeared to satisfy Title VII's administrative-exhaustion and filing-timeliness requirements because Franklin alleged that she filed an EEOC charge, received a right-to-sue letter, and filed suit within the ninety-day period specified in the letter.
4. Because the deficiencies might be cured by providing additional factual detail, the plaintiff was entitled to an opportunity to file an amended complaint before the action was dismissed.

KEY QUOTATIONS

“To successfully state a claim of employment discrimination, the plaintiff must “allege enough facts to allow for a plausible inference that the adverse action was connected to her protected characteristics.””

“The complaint must explain what the promotion was for (what a backup SBU officer is) and whether the promotion was for a job at Stellantis Chrysler or for a position with UAW Solidarity House.”

FACTUAL BACKGROUND

Sabrina Franklin alleged that after another employee declined a backup SBU office position in 2021, union officials told Franklin that the position was hers but repeatedly delayed her training and allegedly failed to submit or process her paperwork. She alleged that the delay continued through 2024 and that she was never actually promoted. Franklin attributed the failure to promote her to race and color discrimination, filed an EEOC charge on December 12, 2024, and received a right-to-sue letter dated March 24, 2025.

PROCEDURAL HISTORY

Franklin filed the complaint on May 30, 2025, alleging that defendants delayed training and failed to process her promotion because of her race and color. She paid the filing fee. FCA US LLC and Paul Ludka appeared and answered, with FCA US LLC advising that it was the proper legal entity in place of Stellantis Chrysler. After screening, the court found the complaint deficient, dismissed the individual defendants from the Title VII claims, and ordered Franklin to file an amended complaint by January 30, 2026 or face dismissal without prejudice.

DISPOSITION

other

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- United States ex rel. v. Lockheed-Martin Corp., 328 F.3d 374, 378 (7th Cir. 2003)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Chaidez v. Ford Motor Co., 937 F.3d 998, 1004 (7th Cir. 2019)
- Beamon v. Marshall & Ilsley Trust Co., 411 F.3d 854, 860 (7th Cir. 2005)
- Kaminski v. Elite Staffing, Inc., 23 F.4th 774, 777 (7th Cir. 2022)
- Wince v. CBRE, Inc., 66 F.4th 1033, 1041 (7th Cir. 2023)
- Nischan v. Stratosphere Quality, LLC, 865 F.3d 922, 930 (7th Cir. 2017)
- Bronson v. Ann & Robert H. Lurie Children's Hospital of Chicago, 69 F.4th 437, 448 (7th Cir. 2023)

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