

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Connie Denice Watson v. Kendra Glenn

Watson · No. 26-10487 · Decided March 6, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan dismissed Connie Denice Watson’s pro se complaint against Kendra Glenn without prejudice under 28 U.S.C. § 1915(e)(2)(B). The court concluded that the complaint failed to state viable claims under the cited criminal statutes and civil RICO, and did not comply with Federal Rule of Civil Procedure 8.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Judith E. Levy
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	March 6, 2026
DOCKET	26-10487
DISPOSITION	dismissed
PROCEDURAL POSTURE	The plaintiff filed a pro se complaint and sought to proceed without prepaying fees or costs. The district court screened the complaint under 28 U.S.C. § 1915(e)(2)(B) and dismissed it without prejudice for failure to state a claim and frivolousness.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis complaint that is frivolous or fails to state a claim. A complaint is frivolous when it relies on fantastic or delusional factual allegations or indisputably meritless legal theories. For failure to state a claim, the complaint must allege sufficient facts, assumed true, to raise a right to relief above the speculative level. Pro se pleadings are liberally construed but remain subject to basic pleading standards.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Connie Denice Watson v. Kendra Glenn

TOPICS

civil procedure

pleadings

patent law

PRACTICE AREAS

civil procedure

intellectual property

patent law

RICO

QUESTIONS PRESENTED

1. Whether the complaint should be dismissed during screening under 28 U.S.C. § 1915(e)(2)(B) for failure to state a claim or frivolousness.
2. Whether 18 U.S.C. §§ 1001, 287, and 1028 provide a private right of action.
3. Whether the complaint pleaded sufficient facts to state a civil RICO claim under 18 U.S.C. § 1962.
4. Whether the complaint complied with Federal Rules of Civil Procedure 8(a) and 8(d)(1).

HOLDINGS

1. A complaint filed by a plaintiff proceeding without prepayment of fees or costs must be dismissed under 28 U.S.C. § 1915(e)(2)(B) when it is frivolous or fails to state a claim.
2. 18 U.S.C. §§ 1001, 287, and 1028 do not provide a private right of action.
3. A civil RICO claim is inadequately pleaded when the complaint does not allege sufficient plausible facts showing racketeering activity or the collection of an unlawful debt under 18 U.S.C. § 1962.
4. A complaint must provide a short and plain statement of the grounds for jurisdiction, the claim showing entitlement to relief, and the relief sought, and each allegation must be simple, concise, and direct.

KEY QUOTATIONS

“A complaint can be frivolous either factually or legally.”

“But the rule that pro se filings should be liberally construed does not exempt pro se litigants from basic pleading standards.”

“Without such clarity, the Court is unable to conclude that the complaint adequately puts Defendants on notice of the claims against them and, as such, the complaint is not viable.” (PageID.6)

FACTUAL BACKGROUND

Watson alleged that Glenn stole her idea for an invention involving filling and tying water balloons. The complaint asserted claims under several federal criminal statutes and civil RICO, but its allegations were conclusory, repetitive, and difficult to understand. Watson had filed numerous similar lawsuits concerning the alleged water-balloon invention, but this complaint was filed before a prior injunction restricting further filings became effective.

PROCEDURAL HISTORY

On February 11, 2026, Watson filed a complaint alleging that Glenn stole her water-balloon invention. Because Watson sought to proceed without prepaying the filing fee, the court screened the complaint under the in forma pauperis statute. The court concluded that the asserted criminal-statute claims lacked a private right of action, the civil RICO allegations were insufficient, and the complaint violated Federal Rules of Civil Procedure 8(a) and 8(d)(1).

DISPOSITION

dismissed

CASES CITED

- Watson v. Sikorcin, No. 25-13511, 2026 WL 497793 (E.D. Mich. Feb. 23, 2026)
- Anson v. Corr. Corp. of Am., 529 F. App'x 558, 559 (6th Cir. 2013)
- Lappin, 630 F.3d at 470
- Brand v. Motley, 526 F.3d 921, 923 (6th Cir. 2008)
- Neitzke v. Williams, 490 U.S. 319, 327-28 (1989)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Sutton v. Mountain High Invs., LLC, No. 21-1346, 2022 WL 1090926, at *2 (6th Cir. Mar. 1, 2022)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Johnson v. E. Tawas Hous. Comm'n, No. 21-1304, 2021 WL 7709965, at *1 (6th Cir. Nov. 9, 2021)
- Wells v. Brown, 891 F.2d 591, 594 (6th Cir. 1989)
- Swierkiewicz v. Sorema N.A., 534 U.S. 506, 507 (2002)