

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Melvin Harris v. St. Louis County, et al.

Harris · No. 4:25-cv-01017-MTS · Decided February 23, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri addresses Defendants’ motion to dismiss Melvin Harris’s First Amended Complaint under Rule 12(b)(6). The Court holds that Harris plausibly pleaded a Fourth Amendment excessive-force claim against Officer Stanley Dooley in his individual capacity, but failed to state a Monell claim against St. Louis County. The motion is granted in part and denied in part, leaving the individual-capacity claim against Dooley pending.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 23, 2026
DOCKET	4:25-cv-01017-MTS
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Plaintiff's First Amended Complaint asserting claims under 42 U.S.C. § 1983.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepted well-pleaded factual allegations as true, drew reasonable inferences in Plaintiff's favor, and assessed whether the complaint stated a facially plausible claim. For qualified immunity at the pleading stage, the court asked whether the alleged facts showed a constitutional violation and whether the right was clearly established.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; nonprecedential
PARTIES	Melvin Harris v. St. Louis County, Stanley Dooley

TOPICS

section 1983

qualified immunity

police misconduct

municipal liability

motions to dismiss

PRACTICE AREAS

civil rights

constitutional torts

municipal liability

federal civil procedure

QUESTIONS PRESENTED

1. Whether Harris plausibly alleged that Officer Dooley used excessive force in violation of the Fourth Amendment and whether Dooley was entitled to qualified immunity at the motion-to-dismiss stage.
2. Whether Harris's official-capacity claim against Dooley was duplicative of his claim against St. Louis County.
3. Whether Harris plausibly pleaded municipal liability against St. Louis County based on an official policy, an unofficial custom, or failure to train or supervise.

HOLDINGS

1. Harris plausibly alleged that Dooley violated the Fourth Amendment by using deadly force against an allegedly unarmed fleeing suspect who did not pose a significant threat, and the allegations were sufficient at the pleading stage to defeat qualified immunity.
2. The official-capacity claim against Dooley was duplicative of the Monell claim against St. Louis County and was dismissed.
3. Harris failed to state a plausible Monell claim under an official-policy, unofficial-custom, failure-to-train, or failure-to-supervise theory because he did not allege sufficient facts connecting an official County policy or persistent custom, or a known training or supervision deficiency, to the alleged constitutional violation.

KEY QUOTATIONS

“To survive a Rule 12(b)(6) motion to dismiss, “a complaint must contain sufficient factual matter, accepted as true, ‘to state a claim to relief that is plausible on its face.’””

“Based on the facts alleged in the Amended Complaint, a reasonable officer would have known “that the use of deadly force against a fleeing suspect who does not pose a significant threat . . . to the officer or others is not permitted.””

“Plaintiff failed to provide the necessary factual allegations to plead a Monell claim under any theory of liability.”

FACTUAL BACKGROUND

Harris was driving near protests and civil unrest when police pursued his vehicle after claiming that someone inside had fired gunshots. After the pursuit ended on a dead-end street, Harris and two passengers fled on foot; Harris alleged that he was clearly unarmed and was the last person to jump a fence. Officer Stanley Dooley allegedly pursued Harris with his firearm drawn and pointed at him, yelled an insult, and fired thirteen shots, eleven of which struck Harris. A firearm belonging to one passenger was later recovered in the woods, and Harris subsequently pleaded guilty to felony resisting arrest.

PROCEDURAL HISTORY

Harris filed suit in Missouri state court after pleading guilty to felony resisting arrest. Defendants removed the action to the Eastern District of Missouri under 28 U.S.C. § 1441(a). Harris filed a First Amended Complaint as a matter of course, and Defendants renewed their motion to dismiss. The court denied dismissal of the individual-capacity excessive-force claim against Officer Dooley but dismissed the official-capacity claim against Dooley and the Monell claim against St. Louis County.

DISPOSITION

other

CASES CITED

- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Glick v. W. Power Sports, Inc., 944 F.3d 714, 717 (8th Cir. 2019)
- Braden v. Wal-Mart Stores, 588 F.3d 585, 594 (8th Cir. 2009)
- Davis v. Washington University in St. Louis, 960 F.3d 478, 483 (8th Cir. 2020)
- Mitchell v. Forsyth, 472 U.S. 511, 526 (1985)
- Harlow v. Holladay, 859 F.3d 529, 533 (8th Cir. 2017)
- Barton v. Taber, 820 F.3d 958, 963 (8th Cir. 2016)
- Torres v. City of St. Louis, 39 F.4th 494, 502 (8th Cir. 2022)
- Barnes v. Felix, 605 U.S. 73, 76, 80 (2025)
- Hageman v. Minnesota Department of Corrections, No. 22-2098, 2023 WL 4760732, at *1-2 (8th Cir. July 26, 2023)
- Moore v. Indehar, 514 F.3d 756, 762-63 (8th Cir. 2008)
- Tennessee v. Garner, 471 U.S. 1, 11 (1985)
- Williams, 27 F.4th at 1352
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 556 (2007)
- Elder-Keep v. Aksamit, 460 F.3d 979, 986 (8th Cir. 2006)
- Lokey v. St. Louis County, 4:19-cv-2475-MTS, 2020 WL 6544240, at *3 (E.D. Mo. Nov. 6, 2020)
- Snider v. City of Cape Girardeau, 752 F.3d 1149, 1160 (8th Cir. 2014)
- Morgan v. Fairfield County, 903 F.3d 553, 565 (6th Cir. 2018)
- White v. City of St. Louis, 4:25-cv-0031-MTS, 2025 WL 1360703, at *2 (E.D. Mo. May 9, 2025)
- Stockton v. Milwaukee County, 44 F.4th 605, 617 (7th Cir. 2022)
- Henry v. Iron County, 1:24-cv-0218-MTS, 2025 WL 2780909, at *4 (E.D. Mo. Sept. 30, 2025)
- Mitchell v. Saint Louis County, 160 F.4th 950, 964 (8th Cir. 2025)
- Waters v. Madson, 921 F.3d 725, 743 (8th Cir. 2019)
- Henderson v. Harris County, Henderson v. Harris County, 51 F.4th 125, 130 (5th Cir. 2022)
- Littlejohn v. City of New York, 795 F.3d 297, 315 (2d Cir. 2015)

- King v. Hendricks County Commissioners, 954 F.3d 981, 985 (7th Cir. 2020)
- Pembaur v. City of Cincinnati, 475 U.S. 469, 479-80 (1986)
- Hightower v. City of Philadelphia, 130 F.4th 352, 356 (3d Cir. 2025)
- Singletary v. District of Columbia, 766 F.3d 66, 73 (D.C. Cir. 2014)
- Bennett v. City of Slidell, 728 F.2d 762, 769 (5th Cir. 1984) (en banc)
- Moore v. LaSalle Management Co., 41 F.4th 493, 509 (5th Cir. 2022)
- Connick v. Thompson, 563 U.S. 51, 61 (2011)
- Miller v. Calhoun County, 408 F.3d 803, 815 (6th Cir. 2005)
- Watkins v. City of St. Louis, 102 F.4th 947, 954 (8th Cir. 2024)
- Board of County Commissioners of Bryan County, Oklahoma v. Brown, 520 U.S. 397, 405 (1997)
- Allen v. Hays, 65 F.4th 736, 749 (5th Cir. 2023)
- Reitz v. County of Bucks, 125 F.3d 139, 145 (3d Cir. 1997)
- Ruiz-Cortez v. City of Chicago, 931 F.3d 592, 599 (7th Cir. 2019)
- Atkinson v. City of Mountain View, 709 F.3d 1201, 1216-17 (8th Cir. 2013)
- Andrews v. Fowler, 98 F.3d 1069, 1076 (8th Cir. 1996)

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