

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

Maurice Campbell v. Erin Halbert et al.

Campbell · No. 4:25-cv-01270-SRC · Decided March 27, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri grants Maurice Campbell leave to proceed in forma pauperis but dismisses his 42 U.S.C. § 1983 complaint without prejudice under 28 U.S.C. § 1915(e)(2)(B). The court concludes that the claims against state entities and officials fail because of sovereign immunity, lack of municipal-policy allegations, insufficient personal involvement, and failure to plead a plausible constitutional violation; it also denies appointment of counsel as moot.

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	March 27, 2026
DOCKET	4:25-cv-01270-SRC
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented prisoner filed a 42 U.S.C. § 1983 complaint, moved to proceed in forma pauperis, and moved for appointment of counsel. The district court granted leave to proceed in forma pauperis, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the action without prejudice, and denied appointment of counsel as moot.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court may dismiss an in forma pauperis action that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. On screening, the court accepts well-pleaded factual allegations as true, disregards legal conclusions and unsupported factual assumptions, liberally construes a self-represented litigant's complaint, and determines whether the allegations state a facially plausible claim for relief.
PRECEDENTIAL VALUE	unpublished

TOPICS

section 1983

prisoners rights

sovereign immunity

injunctions

civil procedure

PRACTICE AREAS

civil rights litigation

prisoner civil rights

constitutional litigation

civil procedure

QUESTIONS PRESENTED

1. Whether the Missouri Board of Probation and Parole and the ERDCC Records Office were suable persons under 42 U.S.C. § 1983.
2. Whether claims against the state entities and governmental employees in their official capacities were barred by sovereign immunity or failed to satisfy the requirements for official-capacity liability.
3. Whether the complaint plausibly alleged personal involvement and a causal connection between each individual defendant's conduct and a constitutional violation.
4. Whether parole-related decision-making by the defendants was protected by absolute quasi-judicial immunity.
5. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2)(B).

HOLDINGS

1. The Missouri Board of Probation and Parole and the ERDCC Records Office are state entities and are not persons subject to suit under 42 U.S.C. § 1983. Claims against them were properly dismissed under 28 U.S.C. § 1915(e)(2)(B).
2. The official-capacity claims failed because the complaint did not identify a municipal policy, widespread custom, or deliberately indifferent failure to train or supervise causing the alleged injuries, and the claims against state parole and correctional officials were unavailable or immune. The requested prospective injunction also failed because the complaint did not plausibly allege an ongoing federal violation traceable to a named official with authority to provide relief.
3. The individual-capacity claims failed because Campbell did not plead defendant-specific facts establishing each defendant's personal involvement in, or causal connection to, a constitutional deprivation.
4. To the extent Campbell challenged parole-related decision-making itself, the relevant functions were quasi-judicial and protected by absolute immunity.
5. The complaint was dismissed without prejudice under 28 U.S.C. § 1915(e)(2)(B), and the motion for appointment of counsel was denied as moot.

KEY QUOTATIONS

“To sufficiently state a claim for relief, a complaint must plead more than “legal conclusions,” and “[t]hreadbare recitals of the elements of a cause of action [that are] supported by mere conclusory statements.”” (Section II)

“Section 1983 requires a causal link between each defendant’s own conduct and the alleged violation.”
(Section III.B.ii)

“For these reasons, the Court grants Campbell’s [2] Motion for Leave to Proceed in forma pauperis and dismisses this case without prejudice under 28 U.S.C. § 1915(e)(2)(B).” (Section IV)

FACTUAL BACKGROUND

Campbell alleged that parole and correctional officials relied on false information and a false warrant in arresting him on April 1, 2024, and that unidentified officers injured his wrist, searched him, and transported him to the St. Louis City Justice Center. He further alleged delays or denials of medication, mishandling of grievances and property, and mistreatment during his transfer to and confinement at ERDCC, including restraints, searches, poor conditions, and inadequate medical responses. He named parole officials, correctional officials, the Missouri Board of Probation and Parole, and the ERDCC Records Office, and sought damages and injunctive relief under § 1983.

PROCEDURAL HISTORY

Campbell filed a pro se civil-rights complaint arising from his arrest, parole-related proceedings, and confinement at the St. Louis City Justice Center and ERDCC. The court granted his motion to proceed in forma pauperis, waived the filing fee, and dismissed the complaint during statutory screening because the claims against state entities were barred or unavailable under § 1983, the official-capacity claims were inadequately pleaded or immune, and the individual-capacity claims lacked sufficient personal involvement and plausible constitutional theories. The court denied appointment of counsel as moot and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Barton v. Taber, 820 F.3d 958, 964 (8th Cir. 2016)
- White v. Clark, 750 F.2d 721, 722 (8th Cir. 1984) (per curiam)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972) (per curiam)
- Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015)
- Stone v. Harry, 364 F.3d 912, 914-15 (8th Cir. 2004)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980)
- McNeil v. United States, 508 U.S. 106, 113 (1993)
- West v. Atkins, 487 U.S. 42, 48 (1988)

- Will v. Mich. Dep't of State Police, 491 U.S. 58, 71 (1989)
- Alsbrook v. City of Maumelle, 184 F.3d 999, 1010 (8th Cir. 1999)
- Morstad v. Dep't of Corr. & Rehab., 147 F.3d 741, 743-44 (8th Cir. 1998)
- S.A.A. v. Geisler, 127 F.4th 1133, 1139-40 (8th Cir. 2025)
- Hafer v. Melo, 502 U.S. 21, 25 (1991)
- Mick v. Raines, 883 F.3d 1075, 1079 (8th Cir. 2018)
- Verizon Md., Inc. v. Pub. Serv. Comm'n of Md., 535 U.S. 635, 645 (2002)
- White v. Jackson, 865 F.3d 1064, 1081 (8th Cir. 2017)
- Keeper v. King, 130 F.3d 1309, 1314 (8th Cir. 1997)
- Reynolds v. Dormire, 636 F.3d 976, 981 (8th Cir. 2011)
- Madewell v. Roberts, 909 F.2d 1203, 1208 (8th Cir. 1990)
- Figg v. Russell, 433 F.3d 593, 598-600 (8th Cir. 2006)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION MAURICE CAMPBELL,)) Plaintiff,)) v.) Case No. 4:25-cv-01270-SRC) ERIN HALBERT et al.,)) Defendants.) Memorandum and Order Maurice Campbell, a self-represented litigant, brings this action under 42 U.S.C. § 1983, asserting claims arising from his April 2024 arrest and subsequent confinement at the St. Louis City Justice Center and Eastern Reception, Diagnostic and Correctional Center.

Doc. 1 at 10–16 (The Court cites to page numbers as assigned by CM/ECF.). Campbell moves for leave to proceed in forma pauperis, doc. 2, and for appointment of counsel, doc. 3. The Court grants Campbell's motion to proceed in forma pauperis and waives the filing fee. But for the reasons set forth below, the Court dismisses the complaint under 28 U.S.C. § 1915(e)(2)(B) and denies the motion for appointment of counsel as moot.

I. Background Campbell names as defendants Parole Analyst Erin Halbert, Parole Officer Misti Gimlin, Parole Supervisor Kellee Chambers, Hearing Officer Carol Lyree Price, the Missouri Board of Probation and Parole, the Commissioner of the St. Louis City Justice Center, the Warden of the Eastern Reception, Diagnostic and Correctional Center ("ERDCC"), and the Records Office of ERDCC.

Doc. 1 at 3–6. He presents his case in a lengthy, first-person narrative that covers a broad range of events occurring at three distinct institutions. Doc. 1 at 10–16. Although Campbell names eight defendants, he largely (1) pleads collective allegations without tying specific conduct to particular defendants or (2) pleads specific conduct against unnamed persons whom he does not name as defendants.

See *id.* According to the complaint, in February 2024, Officer Gimlin spoke with Campbell about a “field violation report” dated February 5, 2024 regarding a “domestic assault and arrest charge” from 2022. *Id.* at 10. Campbell says he “warned” Gimlin of his innocence regarding the underlying domestic-assault allegations. *Id.* He further alleges that in December 2023, Analyst Halbert emailed false information to Gimlin about Campbell’s April 2022 arrest.

Id. Campbell also states that Supervisor Chambers approved a “false warrant, false arrest[,] and false imprisonment with an issuance date of 2/5/2024.” *Id.* On April 1, 2024, Campbell asserts he attended a regular parole appointment with Gimlin. *Id.* After receiving his next appointment date, he alleges that three unidentified white male officers entered the office and arrested him.

Id. He says the officers claimed to have a warrant and that one cut the inside of his right wrist while handcuffing him. *Id.* According to Campbell, the officers denied his request to see the warrant and did not advise him of his Miranda rights. *Id.* Campbell reports carrying legal documents at the time of the arrest, including a copy of a dismissal order dated March 27, 2024.

Id. He alleges he asked Gimlin to retrieve that order and give it to her supervisor. *Id.* He further alleges officers led him to a back room, searched his belongings, and transported him to the St. Louis City Justice Center. *Id.* at 10–11.

On arrival, an officer searched him again. *Id.* at 11. He then requested and received an alcohol pad for his bleeding wrist, and an officer told him he would “see medical.” *Id.* Later that day, an unidentified officer escorted Campbell for processing. *Id.* at 11–12. Campbell alleges he told custody staff that false information led to his detention and that the arrest warrant was “false, bogus[,] and invalid.” *Id.* at 12.

The remainder of the complaint recounts a broad series of events that allegedly occurred at the St. Louis City Justice Center and ERDCC. *Id.* at 12–16. At the Justice Center, Campbell alleges staff delayed or denied prescribed medications despite his repeated requests, and that officials required a second medical intake form after they were unable to locate the original.

Id. at 12–13. He also alleges staff mishandled his grievances regarding medical neglect and the release of his personal property. *Id.* at 13–14. Campbell further alleges that officials “trafficked” him to ERDCC on April 17, 2024. *Id.* at 13. At ERDCC, Campbell alleges intake staff restrained him in tight chains during transport, performed a strip search, sprayed him with chemicals before a shower, issued “nasty food” and dirty clothing and bedding, exposed him to pervasive smoke and odors in housing, gave him “unhealthy meals,” failed to respond to medical request forms, and did not return his property upon release.

Id. at 14–16. After release, Campbell says he incurred replacement costs for his property, discovered damage to his vehicle, and reported ongoing parole-related issues. *Id.* at 15–16. Campbell characterizes defendants’ conduct as kidnapping, racism, trafficking, medical neglect,

retaliation, discrimination, corporal punishment, abuse of process, oppression, abuse of a patient, failure to intervene, conspiracy to deprive him of his civil and human rights, and theft of property.

Id. at 16. He asserts that defendants violated his First, Fourth, Fifth, and Eighth Amendment rights. See *id.* at 7. And he seeks \$3 million in damages and a permanent injunction against the Board of Probation and Parole. *Id.* at 9. II. Standard Under 28 U.S.C. § 1915(e)(2), the Court may dismiss a complaint filed in forma pauperis if the action “(i) is frivolous or malicious; (ii) fails to state a claim on which relief may be granted; or (iii) seeks monetary relief against a defendant who is immune from such relief.” To sufficiently state a claim for relief, a complaint must plead more than “legal conclusions,” and “[t]hreadbare recitals of the elements of a cause of action [that are] supported by mere conclusory statements.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (citing *Bell Atl.*

Corp. v. Twombly, 550 U.S. 544, 555 (2007)). A plaintiff must demonstrate a plausible claim for relief, which requires more than a “mere possibility of misconduct.” *Id.* at 679. “A claim has facial plausibility when the plaintiff pleads factual content that allows the [C]ourt to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.* at 678 (citing *Twombly*, 550 U.S. at 556).

To determine whether a complaint states a plausible claim for relief, the Court must engage in “a context-specific task that requires the reviewing court to draw on its judicial experience and common sense.” *Id.* at 679 (citation omitted).

In doing so, the Court must “accept as true the facts alleged, but not legal conclusions.” *Barton v. Taber*, 820 F.3d 958, 964 (8th Cir. 2016) (citing *Iqbal*, 556 U.S. at 678). When reviewing a self-represented litigant’s complaint under section 1915, the Court accepts the well-pleaded facts as true, *White v. Clark*, 750 F.2d 721, 722 (8th Cir. 1984) (per curiam), and liberally construes the complaint, *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (per curiam); *Haines v. Kerner*, 404 U.S. 519, 520–21 (1972) (per curiam).

A “liberal construction” means that, if the Court can discern “the essence of an allegation,” the “[C]ourt should construe the complaint in a way that permits” the Court to consider the claim within the proper legal framework. *Solomon v. Petray*, 795 F.3d 777, 787 (8th Cir. 2015) (quoting *Stone v. Harry*, 364 F.3d 912, 914 (8th Cir. 2004)). Even so, self-represented plaintiffs must allege facts that, if true, state a claim for relief as a matter of law.

Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980). The Court need not assume unalleged facts. *Stone*, 364 F.3d at 915 (refusing to supply additional facts or to construct a legal theory for the self-represented plaintiff). Nor must it interpret procedural rules to excuse mistakes by those who proceed without counsel. See *McNeil v. United States*, 508 U.S. 106, 113 (1993).

III. Discussion A. State entities Campbell names the Missouri Board of Probation and Parole and the Records Office of ERDCC as defendants. Doc. 1 at 5–6. But section 1983 authorizes suits only against a “person” acting under color of state law. See 42 U.S.C. § 1983; *West v. Atkins*, 487 U.S. 42, 48 (1988). Neither a state nor its agencies qualify as “persons” under section 1983.

Will v. Mich. Dep’t of State Police, 491 U.S. 58, 71 (1989); *Alsbrook v. City of Maumelle*, 184 F.3d 999, 1010 (8th Cir. 1999). And the Eleventh Amendment bars claims against the state and its agencies absent waiver or valid congressional abrogation of immunity. *Morstad v. Dep’t of Corr. & Rehab.*, 147 F.3d 741, 743–44 (8th Cir. 1998). Campbell alleges no waiver or abrogation.

Because the Board and the Records Office are state entities, the Court dismisses Campbell’s claims against them under section 1915(e)(2)(B). B. Individual defendants Campbell names as defendants the Commissioner of the St. Louis City Justice Center, the Warden of ERDCC, Parole Analyst Erin Halbert, Parole Officer Misti Gimlin, Parole Supervisor Kellee Chambers, and Hearing Officer Carol Lyree Price.

Doc. 1 at 3–5. Because Campbell does not clearly delineate capacity, the Court construes the complaint to assert both individual- and official-capacity claims against each defendant. See *S.A.A. v. Geisler*, 127 F.4th 1133, 1139–40 (8th Cir. 2025) (explaining that the key inquiry in a capacity determination is whether the complaint puts the defendant on notice that his personal liability is at stake). i. Official-capacity claims Courts treat official-capacity claims against governmental employees as claims against the governmental entity itself.

Hafer v. Melo, 502 U.S. 21, 25 (1991). To state municipal liability under section 1983, a plaintiff must allege that the municipality’s official policy, unofficial custom, or deliberately indifferent failure to train or supervise caused the asserted injury. *Mick v. Raines*, 883 F.3d 1075, 1079 (8th Cir. 2018).

Here, Campbell alleges isolated misconduct by mostly unidentified staff and pleads no facts identifying a City policy, a widespread custom, or training deficiencies that caused his alleged harm. See doc. 1 at 11–16. He therefore fails to state a plausible official-capacity claim against the Commissioner of the St. Louis City Justice Center. See *Mick*, 883 F.3d at 1079.

Campbell’s official-capacity claims against parole and correctional officials carry the same defects as his claims against the state entities: the State is not a “person” under section 1983, *Will*, 491 U.S. at 71, and absent waiver or valid abrogation, it enjoys sovereign immunity, *Morstad*, 147 F.3d at 744.

To the extent Campbell seeks prospective injunctive relief, doc. 1 at 9, the complaint does not plausibly allege an ongoing federal violation traceable to a named official with authority to provide the requested relief. See *Verizon Md., Inc. v. Pub. Serv. Comm’n of Md.*, 535 U.S. 635, 645 (2002).

The Court therefore dismisses all official-capacity claims under section 1915(e)(2)(B). ii. Individual-capacity claims Section 1983 requires a causal link between each defendant's own conduct and the alleged violation. See *White v. Jackson*, 865 F.3d 1064, 1081 (8th Cir. 2017). Campbell does not allege defendant-specific facts establishing each defendant's personal involvement in a constitutional deprivation.

Campbell pleads no concrete facts tying either the Commissioner or the Warden to any alleged misconduct. See generally doc. 1. Conclusory allegations about their supervisory roles are insufficient. See *Keeper v. King*, 130 F.3d 1309, 1314 (8th Cir. 1997) (noting that "a general responsibility for supervising the operations of a prison is insufficient to establish the personal involvement required to support liability" (citation omitted)); *Reynolds v. Dormire*, 636 F.3d 976, 981 (8th Cir.

2011) ("[A] warden's general responsibility for supervising the operations of a prison is insufficient to establish personal involvement." (citation omitted)). Similarly, Campbell pleads only that Halbert emailed false information to Gimlin and that Chambers approved a "false warrant, false arrest[,] and false imprisonment." Doc. 1 at 10. Absent facts showing knowledge, intent, or direct participation, these allegations do not plausibly link Halbert or Chambers to a constitutional violation.

See *Madewell v. Roberts*, 909 F.2d 1203, 1208 (8th Cir. 1990). As to Gimlin, although Campbell alleges she witnessed his arrest and interacted with him, see doc. 1 at 10–11, the complaint does not plausibly connect her to a clearly pleaded constitutional theory. Campbell's collective assertions that officials "knew or should have known" that Missouri was prosecuting a case against him "where [he] was never charged, arrested[,] [or] jailed by a police officer," see *id.* at 13, do not satisfy that requirement, either.

See *White*, 865 F.3d at 1081; *Madewell*, 909 F.2d at 1208. And Campbell makes no factual allegations against Price. See generally doc. 1. To the extent Campbell challenges any defendant's parole-related decision-making itself, those functions are quasi-judicial and protected by absolute immunity. See *Figg v. Russell*, 433 F.3d 593, 598-600 (8th Cir. 2006) (recognizing absolute immunity for parole board members performing adjudicatory parole functions and for a parole agent acting as an extension of the board in carrying out those functions).

The Court therefore dismisses Campbell's individual-capacity claims under section 1915(e)(2)(B). IV. Conclusion For these reasons, the Court grants Campbell's [2] Motion for Leave to Proceed in forma pauperis and dismisses this case without prejudice under 28 U.S.C. § 1915(e)(2)(B). A separate Order of Dismissal accompanies this Memorandum and Order.

The Court certifies that an appeal from this dismissal would not be taken in good faith. Finally, the Court denies as moot Campbell's [3] Motion for Appointment of Counsel. So ordered this 27th

day of March 2026. sur. CL. STEPHENR.CLARK i i ss CHIEF UNITED STATES DISTRICT
JUDGE

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