

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PRECEDENTIAL VALUE	unpublished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)