

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Michalopoulos v. Schiff

Michalopoulos · No. 26-cv-1139 (JMC) · Decided May 13, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed St. Stefan Michalopoulos’s pro se complaint against Senator Adam Schiff for failure to comply with Federal Rule of Civil Procedure 8(a)(2). The court found that the lengthy complaint and exhibits did not identify a cognizable harm, responsible party, or legal basis for relief, but granted leave to amend within 30 days and denied a motion for service as moot.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	May 13, 2026
DOCKET	26-cv-1139 (JMC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed a civil complaint, and the district court sua sponte dismissed it for failure to comply with Federal Rule of Civil Procedure 8(a)(2), while granting leave to amend.
STANDARD OF REVIEW	The court applied the requirements of Federal Rule of Civil Procedure 8(a)(2) and reviewed the sufficiency of the complaint for compliance with the rule.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia Circuit.
PARTIES	St. Stefan Michalopoulos v. Senator Adam Schiff

TOPICS

- pleadings
- civil procedure

PRACTICE AREAS

- civil procedure

QUESTIONS PRESENTED

1. Whether the complaint complied with Federal Rule of Civil Procedure 8(a)(2)'s requirement for a short and plain statement showing entitlement to relief.
2. Whether the district court could dismiss the complaint sua sponte for failure to comply with Rule 8(a).
3. Whether the plaintiff should be granted leave to amend the deficient complaint.

HOLDINGS

1. The complaint failed to comply with Rule 8(a)(2) because, even construed liberally, it did not identify a cognizable harm, the person who caused that harm, or how the law entitled the plaintiff to relief.
2. The district court had authority to dismiss the complaint sua sponte for failure to comply with procedural rules.
3. The plaintiff was granted leave to file an amended complaint within 30 days that cures the identified deficiencies.

KEY QUOTATIONS

“Federal Rule of Civil Procedure 8(a)(2) requires civil complaints to include “a short and plain statement of the claim showing that the pleader is entitled to relief.”” (1)

“Even construing the complaint liberally, the Court is unable to identify what cognizable harm Michalopoulos has suffered, who caused him that harm, and how the law entitles him to any relief.” (2)

“The Court will grant Michalopoulos leave to refile within 30 days (i.e., by June 12, 2026) an amended complaint that cures the existing deficiencies.” (2)

FACTUAL BACKGROUND

The pro se plaintiff filed a 98-page complaint against Senator Adam Schiff, accompanied by 460 pages of exhibits. The pleading listed broad and unclear disputes involving DOJ and FBI personnel, immigration laws, impeachments, criminal laws, alleged cover-ups, and alleged negligence, but did not identify a cognizable injury, the person who caused it, or a legal basis for relief.

PROCEDURAL HISTORY

Michalopoulos filed a 98-page complaint accompanied by 460 pages of exhibits and later filed notices that did not clarify the pleading. The district court dismissed the complaint without prejudice for failure to provide a short and plain statement of a cognizable claim, denied a motion for service as moot, and granted 30 days to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Brown v. WMATA, 164 F. Supp. 3d 33, 35 (D.D.C. 2016)
- Hamrick v. United States, No. 10-cv-857, 2010 WL 3324721, at *1 (D.D.C. Aug. 24, 2010)
- Ciralsky v. CIA, 355 F.3d 661, 668-69 (D.C. Cir. 2004)

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