

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

Frederick Allen Barnes v. Alex Downing, et al.

Barnes · No. 4:25-cv-00804-NCC · Decided April 29, 2026

SUMMARY

In this prisoner civil-rights action under 42 U.S.C. § 1983, the court reviewed the complaint under 28 U.S.C. § 1915(e)(2). The court dismissed the official-capacity claims and the individual-capacity claims against several defendants, but found plausible Eighth Amendment failure-to-protect claims against Alex Downing and Case Manager Lawson and directed service on those defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Noelle C. Collins
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	April 29, 2026
DOCKET	4:25-cv-00804-NCC
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a prisoner civil-rights complaint filed pro se and in forma pauperis under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that fails to state a claim or seeks monetary relief from an immune defendant. At screening, well-pleaded facts are accepted as true, pro se allegations are liberally construed, and the complaint must contain sufficient factual matter to state a plausible claim for relief.
PRECEDENTIAL VALUE	Unknown; memorandum and order from a federal district court, with no reporter citation or stated precedential designation.
PARTIES	Frederick Allen Barnes v. Alex Downing, Shelby Walter, Anne L. Precythe, Jennifer Price, Jody Glore, Brian Davis, Unknown Brown, Unknown Lawson, Barbara Lindell, Jennifer Roach

TOPICS

prisoners rights

section 1983

civil rights

sovereign immunity

civil procedure

PRACTICE AREAS

Prisoner civil rights

Section 1983 litigation

Constitutional torts

Federal pleading and screening

QUESTIONS PRESENTED

1. Whether the complaint stated plausible Eighth Amendment failure-to-protect claims against Downing and Lawson.
2. Whether the complaint stated plausible individual-capacity § 1983 claims against Walter, Precythe, Price, Glore, Davis, Brown, Lindell, and Roach.
3. Whether official-capacity claims for damages against Missouri Department of Corrections employees were barred by sovereign immunity and the Eleventh Amendment.
4. Whether the complaint adequately pleaded personal involvement rather than relying on supervisory or respondeat superior liability.

HOLDINGS

1. Official-capacity claims for damages against the defendants, who were alleged to be employees of a Missouri state agency, were dismissed without prejudice because such claims are treated as claims against the state or its agency and are barred by Eleventh Amendment immunity; the officials are also not persons subject to damages liability under § 1983 in their official capacities.
2. The complaint plausibly stated individual-capacity Eighth Amendment failure-to-protect claims against Downing and Lawson, and the court directed that they be served.
3. The complaint failed to state plausible individual-capacity § 1983 claims against Walter, Precythe, Price, Glore, Davis, Brown, Lindell, and Roach, so those defendants were dismissed without prejudice.

KEY QUOTATIONS

“A suit against a public official in his or her official capacity is actually a suit against the entity for which the official is an agent.”

“A claim has facial plausibility when the plaintiff pleads factual content that allows the Court to draw the reasonable inference that the defendant is liable for the misconduct alleged.”

FACTUAL BACKGROUND

Barnes, a Missouri prisoner, alleged that while handcuffed to a restraint bench at the Potosi Correctional Center, he was attacked by another inmate on June 7, 2022. He alleged that Sergeant Alex Downing arranged the assault after learning of Barnes's relationship with Downing's girlfriend, Sergeant Shelby Walter, and that Case Manager Lawson facilitated the attack by removing Barnes from his cell and placing him on the bench. Barnes also alleged that several supervisory and mental-health officials failed to protect him after he notified them of a risk, but he did not provide details showing what they knew or when they knew it.

PROCEDURAL HISTORY

Barnes filed a 42 U.S.C. § 1983 complaint alleging that prison employees arranged or failed to prevent an assault by another inmate. The court screened the complaint, dismissed the official-capacity damages claims against all defendants without prejudice, dismissed the individual-capacity claims against eight defendants without prejudice, and directed service on Alex Downing and Case Manager Lawson in their individual capacities.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 676, 678-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- 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 (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)
- Elder-Keep v. Aksamit, 460 F.3d 979, 986 (8th Cir. 2006)
- Kentucky v. Graham, 473 U.S. 159, 165 (1985)
- Walker v. Missouri Department of Corrections, 213 F.3d 1035, 1036 (8th Cir. 2000)
- Nix v. Norman, 879 F.2d 429, 432-33 (8th Cir. 1989)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Young v. Selk, 508 F.3d 868, 872 (8th Cir. 2007)
- Jackson v. Nixon, 747 F.3d 537, 543 (8th Cir. 2014)
- Keeper v. King, 130 F.3d 1309, 1314 (8th Cir. 1997)
- Beaulieu v. Ludeman, 690 F.3d 1017, 1030 (8th Cir. 2012)
- Farmer v. Brennan, 511 U.S. 825, 834, 837 (1994)

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