

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

Jamie Jones v. Sgt. Unknown Harris

Jones v. Harris · No. 1:25-cv-00093-JAR · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of Missouri grants Jamie Jones leave to proceed in forma pauperis but dismisses his 42 U.S.C. § 1983 action without prejudice under 28 U.S.C. § 1915(e)(2)(B). The court concludes that Jones failed to allege a causal connection between Sergeant Harris and the alleged assault by Jones’s cellmate and failed to plead facts supporting municipal liability based on a county policy, custom, or failure to train or supervise. The court denies the pending motions for appointment of counsel and a second in forma pauperis motion as moot and finds that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	December 16, 2025
DOCKET	1:25-cv-00093-JAR
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented civilly committed detainee filed a 42 U.S.C. § 1983 action seeking monetary damages and moved to proceed in forma pauperis and for appointment of counsel. The district court conducted initial screening under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	On initial review under 28 U.S.C. § 1915(e)(2), the court determines whether the complaint is frivolous or malicious, fails to state a claim on which relief may be granted, or seeks monetary relief from an immune defendant. Well-pleaded facts are accepted as true and a self-represented complaint is liberally construed, but the court does not assume unalleged facts or construct a legal theory for the plaintiff. The complaint must contain sufficient factual matter to state a facially plausible claim.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; nonprecedential

TOPICS

section 1983 government liability civil rights pleadings civil procedure

PRACTICE AREAS

civil rights constitutional law prisoner and detainee litigation municipal liability

QUESTIONS PRESENTED

1. Whether Jones's official-capacity § 1983 complaint stated a plausible claim based on the alleged cellmate assault and subsequent removal of the cellmate.
2. Whether the complaint plausibly alleged personal causation, deliberate indifference, or municipal liability through a county policy, custom, or failure to train or supervise.

HOLDINGS

1. A § 1983 claim requires a causal link between the defendant's own actions and the alleged constitutional violation. Jones failed to state a plausible claim because he did not allege that Harris personally participated in the assault, knew of a substantial risk of harm beforehand, or acted with deliberate indifference to Jones's safety.
2. An official-capacity claim is treated as a claim against the governmental entity. To prevail, a plaintiff must plausibly allege that the constitutional violation resulted from an official county policy, an unofficial custom, or a deliberately indifferent failure to train or supervise. Jones alleged none of these, so his official-capacity claim failed.
3. The court was required to dismiss the complaint without prejudice under 28 U.S.C. § 1915(e)(2)(B)(ii) because it failed to state a plausible claim for relief.

KEY QUOTATIONS

“Liability under § 1983, however, requires a causal link between a defendant’s own actions and the alleged constitutional violation.”

“An official-capacity claim is treated as a claim against the governmental entity itself.”

FACTUAL BACKGROUND

Jamie Jones, a civilly committed detainee at the Metropolitan St. Louis Psychiatric Center, alleged that his cellmate assaulted him in April 2024. Jones stated that he later filed a police report and that authorities removed the cellmate from the cell. He did not allege that Sergeant Harris personally participated in the assault, knew beforehand of a substantial risk of harm, or acted with deliberate indifference, and he alleged no county policy, custom, or failure to train or supervise causing the injury.

PROCEDURAL HISTORY

Jones alleged that a cellmate assaulted him in April 2024 and that authorities removed the cellmate after Jones filed a police report. He sued Sergeant Unknown Harris in his official capacity only. The court granted leave to

proceed in forma pauperis, dismissed the action without prejudice for failure to state a plausible claim, denied the duplicative in forma pauperis motion and motions for appointment of counsel as moot, and stated 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 Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- White v. Clark, 750 F.2d 721, 722 (8th Cir. 1984)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980)
- Stone v. Harry, 364 F.3d 912, 914-15 (8th Cir. 2004)
- Madewell v. Roberts, 909 F.2d 1203, 1208 (8th Cir. 1990)
- White v. Jackson, 865 F.3d 1064, 1075 (8th Cir. 2017)
- Mick v. Raines, 883 F.3d 1075, 1079 (8th Cir. 2018)
- Monell v. Department of Social Services of the City of New York, 436 U.S. 658, 690 (1978)

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