

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PRECEDENTIAL VALUE	unpublished district court memorandum and order; nonprecedential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)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION JAMIE JONES,) Plaintiff, v No. 1:25-cv-00093-JAR SGT.
UNKNOWN HARRIS, Defendant, MEMORANDUM AND ORDER Plaintiff Jamie Jones, a
civilly committed detainee at the Metropolitan St. Louis Psychiatric Center, brings this action
under 42 U.S.C. § 1983 against Sergeant “Unknown” Harris of the Cape Girardeau County
Sheriff’s Department.

(ECF No. | at 2). Jones seeks monetary damages arising from an alleged assault by his cellmate in April 2024. *Id.* at 3. He moves for appointment of counsel (ECF Nos. 2, 4) and for leave to proceed in forma pauperis (ECF Nos. 3, 5).

The Court grants Jones leave to proceed in forma pauperis but dismisses this action for the reasons set forth below. The Court denies Jones’s motions for appointment of counsel as moot. I. Standard Because Jones is proceeding in forma pauperis, his complaint is subject to initial review under 28 U.S.C. § 1915(e)(2). That provision requires the Court to dismiss a complaint if it is frivolous or malicious, fails to state a claim on which relief can be granted, or 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 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 Court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.* at 678 (citing *Twombly*, 550 U.S. at 556).

When reviewing a complaint filed by a self-represented person under § 1915, the Court accepts the well-pleaded facts as true, *White v. Clark*, 750 F.2d 721, 722 (8th Cir. 1984), and liberally construes the complaint, *Erickson v. Pardus*, 551 U.S. 89, 94 (2007); *Haines v. Kerner*, 404 U.S. 519, 520 (1972). A “liberal construction” means that if the essence of an allegation is discernible, the district court should construe the complaint in a way that permits the claim to be considered within the proper legal framework.

Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015). 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 v. Harry*, 364 F.3d 912, 914-15 (8th Cir. 2004) (refusing to supply additional facts or to construct a legal theory for the self-represented plaintiff).
II. Discussion Jones sues Sergeant Harris in his official capacity only. (ECF No. 1 at 2). He alleges that his cellmate assaulted him in April 2024 and that he later filed a police report. *Id.* at 3.

Jones further states that “they remove[d] him from the cell.” *Id.* Beyond this, the complaint references “Cape County Sheriff Dept” and “Mental and Physical,” but provides no additional factual context. *Jd.* Jones’s complaint fails to state a plausible claim for relief under § 1983. He alleges only that his cellmate assaulted him and that, after he made a police report, authorities removed the cellmate from the cell.

Liability under § 1983, however, requires a causal link between a defendant’s own actions and the alleged constitutional violation. See *Madewell v. Roberts*, 909 F.2d 1203, 1208 (8th Cir. 1990). Jones does 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.

Additionally, as noted above, Jones sues Harris in his official capacity only. An official-capacity claim is treated as a claim against the governmental entity itself. *White v. Jackson*, 865 F.3d 1064, 1075 (8th Cir. 2017).

Accordingly, to prevail on his official-capacity claim, Jones must establish that Cape Girardeau County itself is liable for the alleged misconduct. *Id.* To do so, Jones must demonstrate that the alleged constitutional violations resulted from (1) an official county policy, (2) an unofficial

custom, or (3) a deliberately indifferent failure to train or supervise, *Mick v. Raines*, 883 F.3d 1075, 1079 (8th Cir.

2018); see also *Monell v. Dep't of Soc. Servs. of City of New York*, 436 U.S. 658, 690 (1978). Jones does not allege facts plausibly showing that a policy, custom, or failure to train or supervise by Cape Girardeau County caused the alleged constitutional violation. Even liberally construed, his allegations therefore do not support a plausible inference of county liability.

See *Iqbal*, 556 U.S. at 678. III. Conclusion For the foregoing reasons, the Court grants Jones's motion to proceed in forma pauperis (ECF No. 3) and dismisses this action for failure to state a plausible claim to relief under § 1915(e)(2)(B)(i).

Accordingly, IT IS HEREBY ORDERED that Jones's motion to proceed in forma pauperis (ECF No. 3) is GRANTED. IT IS FURTHER ORDERED that Jones's second motion to proceed in forma pauperis (ECF No. 5) is DENIED as moot. IT IS FURTHER ORDERED that Jones's motions for appointment of counsel (ECF Nos. 2, 4) are DENIED as moot. IT IS FURTHER ORDERED that this action is DISMISSED without prejudice under 28 U.S.C. § 1915(e)(2)(B)(i).

IT IS FURTHER ORDERED that an appeal from this dismissal would not be taken in good faith. A separate Order of Dismissal accompanies the Memorandum and Order. Dated this 16th day of December, 2025. WANE HOW UNITED STATES DISTRICT JUDGE