

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
NORTH CAROLINA, SOUTHERN DIVISION

Jimmy Keels Williamson v. Christian Recovery Centers, Inc.

Williamson · No. 7:24-CV-1153-FL · Decided November 21, 2025

SUMMARY

The United States District Court for the Eastern District of North Carolina adopted a magistrate judge’s recommendation concerning screening of a pro se complaint under 28 U.S.C. § 1915(e). The court dismissed without prejudice the plaintiff’s Title VII, ADA, and FHA disability-discrimination claims for failure to state a claim, while allowing the FHA racial-discrimination claim to proceed.

CASE DETAILS

COURT	United States District Court for the Eastern District of North Carolina, Southern Division
JURISDICTION	United States District Court for the Eastern District of North Carolina, Southern Division
DECIDED	November 21, 2025
DOCKET	7:24-CV-1153-FL
DISPOSITION	other
PROCEDURAL POSTURE	On review of a pro se complaint under 28 U.S.C. § 1915(e), the district court reviewed and adopted a magistrate judge's memorandum and recommendation recommending partial dismissal.
STANDARD OF REVIEW	Because plaintiff filed no objections to the magistrate judge's memorandum and recommendation, the district court reviewed the magistrate judge's findings and conclusions for clear error.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jimmy Keels Williamson v. Christian Recovery Centers, Inc.

TOPICS

- civil procedure
- title vii
- ada / disability
- racial discrimination
- hostile work environment

PRACTICE AREAS

- civil procedure
- civil rights
- employment discrimination
- housing discrimination
- disability discrimination

QUESTIONS PRESENTED

1. Whether the district court should review the unobjected-to memorandum and recommendation for clear error and adopt it.
2. Whether plaintiff's Title VII race-discrimination and hostile-work-environment claims, ADA disability-discrimination claim, and FHA disability-discrimination claim should be dismissed under 28 U.S.C. § 1915(e)(2)(B) for failure to state a claim.
3. Whether plaintiff's FHA racial-discrimination claim could proceed beyond initial screening.

HOLDINGS

1. When no objections are filed to a magistrate judge's memorandum and recommendation, the district court reviews the magistrate judge's findings and conclusions for clear error and may adopt the recommendation without providing an explanation.
2. The court dismissed plaintiff's Title VII race-discrimination and hostile-work-environment claims, ADA disability-discrimination claim, and FHA disability-discrimination claim without prejudice for failure to state a claim upon which relief can be granted.
3. Plaintiff's FHA housing-discrimination claim based on race was allowed to proceed.

KEY QUOTATIONS

“Because no objections have been filed, the court reviews the magistrate judge’s findings and conclusions only for clear error, and need not give any explanation for adopting the M&R.”

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, brought claims arising from alleged employment and housing discrimination. The complaint asserted race discrimination and hostile work environment under Title VII, disability discrimination under the ADA, and housing discrimination based on race and disability under the FHA. The court concluded that the Title VII, ADA, and FHA disability claims failed to state a claim, while the FHA racial-discrimination claim could proceed.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint asserting Title VII race-discrimination and hostile-work-environment claims, an ADA disability-discrimination claim, and FHA housing-discrimination claims based on race and disability. Magistrate Judge Kimberly A. Swank recommended dismissal of the Title VII, ADA, and FHA disability claims while allowing the FHA racial-discrimination claim to proceed. Plaintiff filed no objections, and the district court adopted the recommendation, dismissed the specified claims without prejudice, and directed issuance of summons for service of the remaining claim.

DISPOSITION

other

CASES CITED

- *Diamond v. Colonial Life & Accident Insurance Co.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Camby v. Davis*, 718 F.2d 198, 200 (4th Cir. 1983)

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