

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Troy K. Scheffler v. Ramona Dohman

785 F.3d 1260 (8th Cir. 2015) · No. 13-3785 · Decided May 12, 2015

SUMMARY

Troy K. Scheffler challenged Minnesota’s restrictions and cancellation of his driving privileges under the Americans with Disabilities Act, asserting that the State regarded him as alcoholic or that his DWI convictions created a record of alcoholism. The Eighth Circuit held that the complaint did not allege facts establishing an ADA disability under any of the statute’s three definitions. The court affirmed dismissal under Federal Rule of Civil Procedure 12(b)(6).

CASE DETAILS

COURT	United States Court of Appeals for the Eighth Circuit
WRITING FOR THE COURT	Shepherd; Colloton; Bright
JURISDICTION	Federal
DECIDED	May 12, 2015
DOCKET	13-3785
DISPOSITION	affirmed
PROCEDURAL POSTURE	Scheffler appealed the dismissal of his ADA complaint under Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim.
STANDARD OF REVIEW	De novo review of a district court's grant of a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6), construing the complaint's allegations in the light most favorable to the nonmoving party.
PRECEDENTIAL VALUE	Published, precedential opinion of the United States Court of Appeals for the Eighth Circuit.
PARTIES	Troy K. Scheffler v. Ramona Dohman, in her official capacity as the Commissioner of Public Safety, State of Minnesota, State of Minnesota

TOPICS

[ada / disability](#)[disability definition](#)[regarded as disabled](#)[appellate procedure](#)[standard of review](#)

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Scheffler adequately alleged that he had an ADA disability based on an actual alcoholism-related impairment that substantially limited a major life activity.
2. Whether multiple DWI convictions and related state-imposed driving restrictions established a record of alcoholism under the ADA.
3. Whether the State regarded Scheffler as having an alcoholism-related impairment under the ADA.

HOLDINGS

1. Scheffler did not allege that he was an alcoholic or that alcoholism substantially limited a major life activity, and therefore he failed to plead a disability under the ADA's first definition.
2. Multiple DWI convictions, without more, do not establish that a person is an alcoholic or that the person has a record of an impairment substantially limiting a major life activity.
3. The State's imposition of restrictions on a driver with multiple DWI offenses did not, without additional facts, establish that the State regarded Scheffler as having an alcoholism-related impairment.
4. The district court properly dismissed the complaint for failure to state a claim because Scheffler failed to allege that he was disabled under the ADA.

KEY QUOTATIONS

"We review de novo a district court's grant of a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6)." (785 F.3d at 1261)

"Driving while intoxicated on multiple occasions does not, in and of itself, establish that [Scheffler] is an alcoholic." (785 F.3d at 1262)

FACTUAL BACKGROUND

Scheffler had multiple DWI arrests and convictions beginning in 1994, resulting in repeated cancellations of his driving privileges and requirements that he complete alcohol rehabilitation programs or comply with restrictions. After a 2010 DWI arrest, he was required to complete a six-year rehabilitation program or participate in an Ignition Interlock Program to obtain a restricted license. He alleged that the State perceived him as an alcoholic or regarded him as having an impairment, and sought restoration of his driving privileges without restrictions.

PROCEDURAL HISTORY

Scheffler sued the Minnesota Commissioner of Public Safety and the State of Minnesota, alleging that Minnesota statutes and rules governing the loss and restoration of driving privileges after multiple DWI offenses violated the ADA. The United States District Court for the District of Minnesota dismissed the complaint, concluding that Scheffler failed to allege that he was an individual with a disability under the ADA. The Eighth Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- Retro Television Network, Inc. v. Luken Communications, LLC, 696 F.3d 766, 768 (8th Cir. 2012)
- Miners v. Cargill Communications, Inc., 113 F.3d 820, 823 (8th Cir. 1997)

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