

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
MICHIGAN

Connie Denice Watson v. Alexis Glenn

Watson · No. 26-10488 · Decided March 4, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan dismissed Connie Denice Watson’s pro se complaint against Alexis Glenn without prejudice. The court held that the complaint failed to state claims under the cited criminal statutes and civil RICO, was frivolous, and did not satisfy Federal Rule of Civil Procedure 8.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                              |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Michigan                                                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Judith E. Levy                                                                                                                                                                                                                                                                                                                               |
| JURISDICTION          | United States District Court for the Eastern District of Michigan                                                                                                                                                                                                                                                                            |
| DECIDED               | March 4, 2026                                                                                                                                                                                                                                                                                                                                |
| DOCKET                | 26-10488                                                                                                                                                                                                                                                                                                                                     |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | The pro se plaintiff filed a complaint and an application to proceed without prepaying fees or costs. After granting permission to proceed without prepayment, the district court screened the complaint under 28 U.S.C. § 1915(e)(2)(B).                                                                                                    |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis complaint that is frivolous or fails to state a claim. A complaint must contain sufficient factual matter to raise a right to relief above the speculative level, and pro se pleadings are liberally construed but must still satisfy basic pleading standards. |
| PRECEDENTIAL VALUE    | unpublished district court order                                                                                                                                                                                                                                                                                                             |
| PARTIES               | Connie Denice Watson v. Alexis Glenn                                                                                                                                                                                                                                                                                                         |

TOPICS

- pleadings
- civil procedure
- commercial litigation
- intellectual property

## PRACTICE AREAS

civil procedure

pleading and screening

RICO

intellectual property

## QUESTIONS PRESENTED

1. Whether the complaint stated a plausible civil RICO claim.
2. Whether the complaint complied with Federal Rule of Civil Procedure 8(a) and 8(d)(1).
3. Whether claims under 18 U.S.C. §§ 1001, 287, and 1028 could proceed despite the absence of a private right of action.
4. Whether the complaint was subject to dismissal as frivolous or for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B).

## HOLDINGS

1. The plaintiff's claims under 18 U.S.C. §§ 1001, 287, and 1028 failed because those criminal statutes do not provide a private right of action.
2. The complaint failed to state a civil RICO claim because it did not allege sufficient plausible facts showing racketeering activity or the collection of an unlawful debt under 18 U.S.C. § 1962.
3. The complaint violated Federal Rule of Civil Procedure 8(a)(2) and 8(d)(1) because it did not provide a short, plain, simple, concise, and direct statement of the claims sufficient to place the defendant on notice.
4. The complaint was dismissed without prejudice under 28 U.S.C. § 1915(e)(2)(B) because it was frivolous and failed to state a claim.

## KEY QUOTATIONS

*“A complaint can be frivolous either factually or legally.”*

*“Rule 8(a)'s express language [] requires simply that the complaint 'give the defendant fair notice of what the plaintiff's claim is and the grounds upon which it rests.'”*

## FACTUAL BACKGROUND

Watson alleged that Glenn stole her idea for a toy involving filling water balloons and tying knots. Her complaint asserted that Glenn was involved in fraud, theft, and related conduct, but the allegations were conclusory, repetitive, and difficult to understand. Watson also asserted claims under federal criminal statutes and civil RICO.

## PROCEDURAL HISTORY

Watson filed suit on February 11, 2026, alleging that Alexis Glenn stole her water-balloon invention. The court screened the complaint because Watson sought to proceed without prepaying fees or costs. The court dismissed the complaint without prejudice for failure to state a claim, frivolousness, and noncompliance with Federal Rule of Civil Procedure 8(a).

## DISPOSITION

dismissed

## CASES CITED

- Watson v. Sikorcin, No. 25-13511, 2026 WL 497793, at \*1–2 (E.D. Mich. Feb. 23, 2026)
- Anson v. Corr. Corp. of Am., 529 F. App'x 558, 559 (6th Cir. 2013)
- Lappin, 630 F.3d at 470
- Brand v. Motley, 526 F.3d 921, 923 (6th Cir. 2008)
- Neitzke v. Williams, 490 U.S. 319, 327–28 (1989)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Sutton v. Mountain High Invs., LLC, No. 21-1346, 2022 WL 1090926, at \*2 (6th Cir. Mar. 1, 2022)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Johnson v. E. Tawas Hous. Comm'n, No. 21-1304, 2021 WL 7709965, at \*1 (6th Cir. Nov. 9, 2021)
- Wells v. Brown, 891 F.2d 591, 594 (6th Cir. 1989)
- Swierkiewicz v. Sorema N. A., 534 U.S. 506, 507 (2002)