

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

Donald W. Sanders v. St. Louis, Missouri U.S. Attorney's Office and
Federal Bureau of Prisons Inmate Trust Fund

Sanders · No. 1:25-cv-00132-SNLJ · Decided December 17, 2025

SUMMARY

The court grants Donald W. Sanders leave to proceed in forma pauperis and assesses an initial partial filing fee of \$1.00. On screening under 28 U.S.C. § 1915(e)(2)(B), the court dismisses without prejudice his claim seeking removal of an encumbrance on his federal inmate trust account, holding that a prior criminal-case order authorized use of the funds toward restitution. The court certifies 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
WRITING FOR THE COURT	Stephen N. Limbaugh, Jr.
JURISDICTION	U.S. District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	December 17, 2025
DOCKET	1:25-cv-00132-SNLJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented federal prisoner filed a civil action seeking an order directing the Federal Bureau of Prisons to remove an encumbrance from his inmate trust account. The court granted leave to proceed in forma pauperis, screened the complaint under 28 U.S.C. § 1915, and dismissed the claims without prejudice as frivolous and for failure to state a claim.
STANDARD OF REVIEW	On initial review under 28 U.S.C. § 1915(e)(2), the court accepts well-pleaded facts as true, liberally construes a self-represented complaint, and dismisses if the action is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. A complaint must plead sufficient factual matter to state a facially plausible claim.

PRECEDENTIAL VALUE	unpublished
PARTIES	Donald W. Sanders v. St. Louis, Missouri U.S. Attorney's Office, Federal Bureau of Prisons Inmate Trust Fund

TOPICS

civil procedure remedies declaratory judgment restitution

PRACTICE AREAS

Federal civil procedure Prisoner civil rights In forma pauperis proceedings Restitution enforcement
Declaratory and equitable relief

QUESTIONS PRESENTED

1. Whether Sanders's complaint stated a plausible claim for an order requiring the Federal Bureau of Prisons to remove the encumbrance on his inmate trust account.
2. 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).
3. Whether Sanders was entitled to proceed in forma pauperis and, if so, what initial partial filing fee should be assessed.

HOLDINGS

1. The court granted Sanders leave to proceed in forma pauperis and assessed an initial partial filing fee of \$1.00.
2. The complaint failed to state a plausible claim for relief because the requested encumbrance removal would conflict with a prior criminal-case order authorizing payment of restitution from Sanders's inmate trust account.
3. The complaint was dismissed without prejudice as frivolous and for failure to state a claim upon which relief may be granted.

KEY QUOTATIONS

“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.”

“The Court cannot order that trust funds be “unencumbered,” as this issue was ruled on over three years ago.”

FACTUAL BACKGROUND

Sanders, a federal prisoner, sought an order requiring the Federal Bureau of Prisons to unencumber his inmate trust account. He was sentenced in 2005 to 33 months' imprisonment and ordered to pay \$73,352.14 in restitution. After funds were transferred from a county-jail account to his federal inmate trust account, the St.

Louis U.S. Attorney's Office caused approximately \$1,031.31 to be encumbered for payment toward restitution. Sanders alleged that the encumbrance had continued for approximately four and one-half years, but the court determined that a 2022 order in his criminal case had already authorized the deduction over his objections.

PROCEDURAL HISTORY

Sanders filed the action and moved to proceed in forma pauperis. The court granted that motion, assessed an initial partial filing fee of \$1.00, and conducted statutory screening. The court determined that a prior order in Sanders's criminal case had already authorized deduction of restitution from his inmate trust account, dismissed the civil complaint without prejudice, directed the Clerk to send Sanders that prior order, and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Henderson v. Norris, 129 F.3d 481, 484 (8th Cir. 1997)
- White v. Clark, 750 F.2d 721, 722 (8th Cir. 1984)
- 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)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- United States v. Bagola, 90 F.4th 1218, 1221-22 (8th Cir. 2024)
- United States v. Evans, 48 F.4th 888, 892 (8th Cir. 2022)
- United States v. Stark, 56 F.4th 1039 (5th Cir. 2023)
- United States v. Sanders, No. 4:04-cr-483-JCH, Doc. 21 (E.D. Mo.)
- United States v. Sanders, No. 4:04-cr-483-JCH, Doc. 47 (E.D. Mo. Oct. 14, 2022)