

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

Deborah Davis v. The Advanced Composite Center, et al.

Davis · No. 4:25-CV-1546-JSD · Decided May 5, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri grants Deborah Davis’s application to proceed in forma pauperis but dismisses her employment-discrimination complaint without prejudice under 28 U.S.C. § 1915(e)(2)(B). The court concludes that Davis failed to plead sufficient facts supporting Title VII discrimination or retaliation, including facts showing disparate treatment or a causal connection to protected activity. The court also dismisses her ADA claim because she did not identify a qualifying disability or allege discrimination based on disability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	May 5, 2026
DOCKET	4:25-CV-1546-JSD
DISPOSITION	dismissed
PROCEDURAL POSTURE	After granting Plaintiff's application to proceed in forma pauperis, the district court conducted the mandatory initial screening of her amended employment-discrimination complaint under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the Court must dismiss an in forma pauperis complaint that is frivolous, malicious, or fails to state a claim. In reviewing a pro se complaint, the Court liberally construes the allegations, assumes the veracity of well-pleaded facts, and determines whether the complaint states a facially plausible claim, but it need not accept conclusory assertions or supply facts not alleged.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown

TOPICS

motions to dismiss

title vii

ada discrimination

retaliation

employment discrimination

PRACTICE AREAS

employment discrimination

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's amended complaint stated a plausible Title VII discrimination claim.
2. Whether Plaintiff's amended complaint stated a plausible Title VII retaliation claim.
3. Whether Plaintiff's amended complaint stated a plausible ADA disability-discrimination claim.
4. Whether the action was subject to dismissal during in forma pauperis screening under 28 U.S.C. § 1915(e)(2).

HOLDINGS

1. The amended complaint failed to state a Title VII discrimination claim because it did not allege facts showing that Plaintiff was treated adversely because of membership in a Title VII protected class, including facts concerning qualification, disparate treatment, or more favorable treatment of similarly situated employees outside the protected class.
2. The amended complaint failed to state a Title VII retaliation claim because it did not adequately allege protected conduct and did not allege a causal link between Plaintiff's prior EEOC complaint or other protected activity and the alleged adverse employment actions.
3. The amended complaint failed to state an ADA discrimination claim because Plaintiff did not allege that she had a disability cognizable under the ADA or that an adverse employment action occurred because of such a disability.
4. The Court was required to dismiss the action without prejudice under 28 U.S.C. § 1915(e)(2)(B) because the amended complaint failed to state a claim under Title VII or the ADA.

KEY QUOTATIONS

“An action is frivolous if it “lacks an arguable basis in either law or fact.””

“An action fails to state a claim upon which relief may be granted if it does not plead “enough facts to state a claim to relief that is plausible on its face.””

“A “liberal construction” means that if the essence of an allegation is discernible, the district court should construe the plaintiff’s complaint in a way that permits his or her claim to be considered within the proper legal framework.”

FACTUAL BACKGROUND

Plaintiff alleged that she worked for her former employer for nearly eleven years and was subjected to probation, criticism, denial or delay of a lead position, and termination in August 2024. She asserted that the defendants discriminated against her based on race, color, and an unspecified additional basis, and retaliated against her for

prior EEOC activity and supporting other employees. Her amended complaint did not identify a disability, provide facts showing disparate treatment based on a Title VII protected characteristic, or clearly identify protected activity causally connected to an adverse employment action.

PROCEDURAL HISTORY

Plaintiff filed an employment discrimination complaint on October 14, 2025, naming the Advanced Composite Center, Boeing, and two Boeing employees. The Court found the complaint deficient and ordered Plaintiff to file an amended complaint, discrimination charges, and a complete in forma pauperis application. Plaintiff filed an amended complaint on November 3, 2025, naming only the Advanced Composite Center and Boeing. The Court granted in forma pauperis status but dismissed the action without prejudice for failure to state claims under Title VII and the ADA, directed the Clerk not to issue process, and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 328 (1989)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- 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)
- McNeil v. United States, 508 U.S. 106, 113 (1993)
- Jackman v. Fifth Judicial Dist. Dep't of Corr. Servs., 728 F.3d 800, 804 (8th Cir. 2013)
- Hill v. Walker, 737 F.3d 1209, 1216 (8th Cir. 2013)
- Sutton v. United Air Lines, Inc., 527 U.S. 471, 483 (1999)
- Mathieu v. Gopher News Co., 273 F.3d 769, 775 (8th Cir. 2001)