

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS

Aaron Michael Stricklin v. Amazon.com Services LLC

Stricklin · No. 4:25-cv-401-JM · Decided March 6, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas grants Amazon.com Services LLC’s partial motion to dismiss an ADA association-discrimination claim brought by former employee Aaron Michael Stricklin. The court holds that EEOC charges may be considered without converting the motion into one for summary judgment and concludes that Stricklin failed to exhaust the association-discrimination claim because his charges addressed only his own disability and accommodation requests. Claim IV of the amended complaint is dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas
WRITING FOR THE COURT	James M. Moody Jr.
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	March 6, 2026
DOCKET	4:25-cv-401-JM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for partial dismissal of Count IV of the amended complaint, which asserted ADA association discrimination. Because Defendant's answer was docketed before its motion to dismiss, Plaintiff argued that the motion should be treated as a motion for judgment on the pleadings. The court treated the distinction as immaterial because the standards are the same and granted the motion.
STANDARD OF REVIEW	A motion for judgment on the pleadings is appropriate when there is no dispute as to any material facts and the moving party is entitled to judgment as a matter of law. Motions under Federal Rule of Civil Procedure 12(b) and 12(c) are reviewed under the same standard. The court may consider public records, documents incorporated by reference, and documents integral to the claim without converting the motion into one for summary judgment.
PRECEDENTIAL VALUE	unknown

PARTIES

Aaron Michael Stricklin v. Amazon.com Services LLC

TOPICS

ada discrimination

motions to dismiss

motion for judgment on the pleadings

civil procedure

ada / disability

PRACTICE AREAS

employment law

disability discrimination

civil procedure

QUESTIONS PRESENTED

1. Whether the court could consider Stricklin's EEOC charges on a Rule 12 motion without converting the motion into one for summary judgment.
2. Whether Stricklin exhausted an ADA association-discrimination claim when neither EEOC charge alleged discrimination based on his partner's disability.
3. Whether liberal pleading standards for a pro se litigant allowed the unexhausted association-discrimination claim to proceed.

HOLDINGS

1. The court could consider the EEOC charges because they were public records and were incorporated by reference into, and integral to, the amended complaint.
2. Stricklin failed to exhaust his ADA association-discrimination claim because neither EEOC charge alleged that he suffered discrimination because of his partner's disability; the claim was therefore dismissed with prejudice.
3. Liberal pleading standards for pro se litigants did not excuse the failure to exhaust the distinct ADA association-discrimination claim.

KEY QUOTATIONS

“Judgment on the pleadings is appropriate only when there is no dispute as to any material facts and the moving party is entitled to judgment as a matter of law.”

“The law is clear that before a court can review an ADA claim, a claimant must raise each distinct ADA claim in a charge before the EEOC and exhaust available administrative remedies.”

“Nothing in this language notices Defendant of anything other than Stricklin’s charges of discrimination surrounding his own disabilities and requests for accommodations, not his partners.”

FACTUAL BACKGROUND

Stricklin, a former part-time seasonal worker for Amazon, alleged that he was harassed, suspended, discharged, and retaliated against because of his disability and requests for accommodation. His amended complaint additionally asserted that he was discriminated against because of his partner's disability. Neither of his EEOC

charges mentioned discrimination based on his partner's disability; the charges referred only to his own disability, accommodation requests, prior EEOC charge, and federal lawsuit.

PROCEDURAL HISTORY

Stricklin filed a pro se ADA employment-discrimination action on April 25, 2025. The court granted in forma pauperis status, screened the complaint, and served the ADA claims. With leave of court, Stricklin filed an amended complaint on September 29, 2025. Amazon answered and moved to dismiss on November 12, 2025, and the court dismissed Count IV with prejudice.

DISPOSITION

dismissed

CASES CITED

- Natl. Union Fire Ins. Co. of Pittsburgh v. Cargill, Inc., 61 F.4th 615, 619 (8th Cir. 2023)
- Ashley Cnty., Ark. v. Pfizer, Inc., 552 F.3d 659, 665 (8th Cir. 2009)
- Blakely v. Schlumberger Tech. Corp., 648 F.3d 921, 931 (8th Cir. 2011)
- Faibisch v. Univ. of Minn., 304 F.3d 797, 802-03 (8th Cir. 2002)
- Williams v. Emps. Mut. Cas. Co., 845 F.3d 891, 903 (8th Cir. 2017)
- Kale v. Aero Simulation, Inc., 139 F.4th 684, 689-90 (8th Cir. 2025)
- Henson v. Union Pac. R.R. Co., 3 F.4th 1075, 1080 (8th Cir. 2021)
- Parisi v. Boeing Co., 400 F.3d 583, 586 (8th Cir. 2005)

OPINION

Stricklin

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

AARON MICHAEL STRICKLIN PLAINTIFF

v. Case No. 4:25-cv-401-JM

AMAZON.COM SERVICES LLC DEFENDANT

ORDER

Pending is Defendant’s partial motion to dismiss (Doc. 59). Stricklin has responded (Doc. 68), and Defendant has replied (Doc. 72). For the reasons set out below, Defendant’s motion is GRANTED. Stricklin, a former part-time seasonal worker for Defendant, brought this pro se workplace discrimination suit on April 25, 2025. (Doc. 2). He sued Defendant under the Americans with Disability Act (ADA) alleging that he was harassed, discriminated against, suffered retaliation, and was wrongly fired because of his disability and needed accommodations. (Id.). The Court granted

Stricklin's motion to proceed in forma pauperis, screened his complaint, and served his ADA claims. (Doc. 4). Before the Court addresses the merits of the pending motion to dismiss, some procedural housekeeping is necessary. With the Court's permission, Stricklin filed an amended complaint on September 29, 2025. (Doc. 46). The Court then granted Defendant time to answer or otherwise respond to the amended complaint. (Doc. 49). Defendant timely did so presenting both its answer and its motion to dismiss to the Clerk of Court on November 12, 2025. By happenstance, the Clerk docketed Defendant's answer first. (Doc. 58–59). As a result, Stricklin now contends that, because Defendant's responsive pleading was docketed first, the Court must treat its motion to dismiss as a motion for judgment on the pleadings. (Doc. 68); Fed. R. Civ. P. 12(b)–(c). While strictly correct, the distinction has little effect as regards the Court's standard of review. See *Natl. Union Fire Ins. Co. of Pittsburgh v. Cargill, Inc.*, 61 F.4th 615, 619 (8th Cir. 2023) (noting that motions for relief filed under either 12(b) or 12(c) require the same standard). "Judgment on the pleadings is appropriate only when there is no dispute as to any material facts and the moving party is entitled to judgment as a matter of law." *Id.* (quoting *Ashley Cnty., Ark. v. Pfizer, Inc.*, 552 F.3d 659, 665 (8th Cir. 2009)). Defendant seeks to dismiss Count IV of Stricklin's amended complaint, which alleges an "association discrimination" claim under the ADA. (Doc. 59). The ADA prohibits discrimination against an employee "because of the known disability of an individual with whom the qualified individual is known to have a relationship or association." 42 U.S.C.A. § 12112 (b)(4). In his amended complaint, Strickland argues for the first time that he suffered discrimination both because of his own disability as well as that of his partner. (Doc. 46 at 15). Defendant correctly contends that, because Stricklin failed to raise this claim in either charge of discrimination made with the EEOC, the claim has not been exhausted and must be dismissed. (Doc. 59). Stricklin does not contest his failure to exhaust; instead, he argues that the Court cannot consider the EEOC documents without improperly converting the motion one for summary judgment. (Doc. 68 at 2). Alternatively, Stricklin ironically argues that Defendant is attempting to "impose a hyper-technical exhaustion requirement" for which he should not be burdened. (*Id.* at 3). Stricklin asserts that his "association discrimination" claim should survive given the "liberal" pleading standards allowed for pro se litigants. (*Id.*). Neither argument is persuasive. Can the Court consider the EEOC documents without converting the motion to one for summary judgment? Yes. The Eighth Circuit has long held that EEOC charges are "part of the public record" which can be considered in a motion to dismiss or motion for judgment on the pleadings. *Blakely v. Schlumberger Tech. Corp.*, 648 F.3d 921, 931 (8th Cir. 2011)(quoting *Faibisch v. Univ. of Minn.*, 304 F.3d 797, 802–03 (8th Cir. 2002)). Further, "courts may consider matters incorporated by reference or integral to the claim." *Natl. Union Fire Ins. Co. of Pittsburgh*, 61 F.4th at 619 (citing *Williams v. Emps. Mut. Cas. Co.*, 845 F.3d 891, 903 (8th Cir. 2017)). Unquestionably, Strickland's EEOC charges are firmly incorporated in his amended complaint and integral to his claims. The question is whether Strickland noticed Defendant of any "association discrimination" claims in his EEOC charges. If he did not, those claims have not been exhausted and cannot be

raised now. The law is clear that before a court can review an ADA claim, a claimant must raise each distinct ADA claim in a charge before the EEOC and exhaust available administrative remedies. *Kale v. Aero Simulation, Inc.*, 139 F.4th 684, 689–90 (8th Cir. 2025). And while “administrative complaints are interpreted liberally in an effort to further the remedial purposes of legislation that prohibits unlawful employment practices,” only claims that are “like or reasonably related” to the claims in the EEOC charge can be deemed exhausted. *Henson v. Union Pac. R.R. Co.*, 3 F.4th 1075, 1080 (8th Cir. 2021) (internal quotations omitted). “[I]t is not reasonable to expect the EEOC to look for and investigate such adverse employment actions if they are nowhere mentioned in the administrative charge.” *Parisi v. Boeing, Co.*, 400 F.3d 583, 586 (8th Cir. 2005). In his first charge of discrimination, Strickland stated, “I believe I was harassed, suspended, and discharged due to my disability and in retaliation for requesting an accommodation” (Doc. 59-1 at 1). In his second charge following his discharge, Strickland stated, “I believe that I was subjected to this treatment because of my disability, my prior EEOC charge . . . , and in retaliation for filing a federal lawsuit.” (Doc. 59-2 at 1). Nothing in this language notifies Defendant of anything other than Strickland’s charges of discrimination surrounding his own disabilities and requests for accommodations, not his partners. Both charges are silent as to any claim that Strickland believed his claims were the result of his partner’s disability. For the reasons set out above, Defendant’s partial motion to dismiss (Doc. 59) is GRANTED. Strickland’s “association discrimination” claim (Claim IV) raised in his amended complaint (Doc. 46) is dismissed with prejudice. IT IS SO ORDERED this 6th day of March, 2026. wn STATES bearer JUDGE