

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

Lisa Burchfield v. Nina Mattingly et al.

Burchfield · No. 4:25-cv-00710-SRC · Decided February 17, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri dismissed Lisa Burchfield’s pro se § 1983 complaint without prejudice under 28 U.S.C. § 1915(e)(2)(B). The court held that Burchfield lacked standing to assert claims on behalf of her daughter and that the claims against the various state, municipal, judicial, police, and private defendants were barred by immunity, failure to plead personal involvement, lack of suable-entity status, or failure to allege state action. The court granted in forma pauperis status and leave to seal the daughter’s affidavit, denied leave to amend, and denied the remaining motions as moot.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Stephen R. Clark
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 17, 2026
DOCKET	4:25-cv-00710-SRC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se 42 U.S.C. § 1983 complaint and moved to proceed in forma pauperis, for appointment of counsel, for a temporary restraining order, for emergency protective relief, and to file an affidavit under seal. The district court screened the in forma pauperis complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed it without prejudice, granted leave to proceed in forma pauperis and the motion to seal, denied leave to amend, and denied the remaining motions as moot.
STANDARD OF REVIEW	The court reviewed the in forma pauperis complaint under 28 U.S.C. § 1915(e)(2)(B), accepting well-pleaded facts as true, disregarding legal conclusions, and liberally construing the pro se pleading while requiring facts sufficient to state a plausible claim for relief.

PRECEDENTIAL VALUE	unpublished
PARTIES	Lisa Burchfield v. Nina Mattingly, Denise Smith, Brittany Chandler, Shomica Davis, Overland Police Department, City of Hazelwood, Jennifer Hoffman, Jason D. Dodson, Walter's Walk Counseling, Samantha Rank, State of Missouri, Judge Olsen, Hazelwood Police Department, St. Louis County Jail, Youth in Need

TOPICS

section 1983

standing

sovereign immunity

motions to dismiss

motion to amend

PRACTICE AREAS

civil rights

civil procedure

constitutional law

family law

remedies

QUESTIONS PRESENTED

1. Whether Burchfield had standing and could proceed pro se on claims asserted on behalf of her daughter.
2. Whether the complaint stated a claim under 42 U.S.C. § 1983 against the State of Missouri and state officials in their official capacities.
3. Whether judicial immunity barred claims against the named judges.
4. Whether the complaint adequately alleged personal involvement by individual defendants.
5. Whether police departments and a county jail were suable entities under § 1983.
6. Whether the complaint adequately pleaded municipal liability against the City of Hazelwood.
7. Whether private defendants could be liable under § 1983 absent allegations that they acted under color of state law.
8. Whether Burchfield's motion to update the case should be treated as a motion to amend and granted.

HOLDINGS

1. A nonlawyer parent proceeding pro se may not represent a child's claims in federal court, and Burchfield therefore lacked standing to assert claims on her daughter's behalf.
2. The State of Missouri and state officials sued in their official capacities are not persons subject to damages liability under § 1983, and sovereign immunity barred the claims because no waiver or congressional abrogation was alleged.
3. The claims for damages against Judges Hoffman, Olsen, and Dodson were barred by judicial immunity, and the complaint did not allege either recognized exception to that immunity.
4. A § 1983 plaintiff must allege each defendant's personal involvement in the alleged constitutional violation; Burchfield failed to do so as to Mattingly, Smith, Chandler, and Dodson.
5. A local police department and a county jail are not distinct legal entities amenable to suit under § 1983.

6. A municipality is not liable under § 1983 based solely on the alleged misconduct of its employees; the plaintiff must plead a constitutional violation resulting from an official policy, unofficial custom, or deliberately indifferent failure to train or supervise.
7. Private conduct generally does not support § 1983 liability absent allegations that the private defendant acted under color of state law.
8. The motion to update the case was properly construed as a motion to amend but was denied because it failed to comply with local pleading requirements and appeared to assert a claim arising from a separate occurrence that should be brought in a separate action.

KEY QUOTATIONS

“Burchfield lacks standing to bring these claims on J.L.’s behalf.” (Section III.A)

“Liability attaches where the constitutional violation “resulted from (1) an official municipal policy, (2) an unofficial custom, or (3) a deliberately indifferent failure to train or supervise.”” (Section III.B.7)

“The Court dismisses, without prejudice, Burchfield’s [1] Civil Complaint under 28 U.S.C. § 1915(e)(2)(B) and denies her [17] motion for leave to amend.” (Conclusion)

FACTUAL BACKGROUND

Burchfield alleged that in September 2021 a therapist contacted Hazelwood police during her daughter’s therapy session and that officers removed the daughter without a court order or investigation. She alleged that the daughter was later placed with others and in Youth in Need, where she suffered abuse, inadequate medical care, a suicide attempt, and other medical problems. Burchfield also alleged that she was arrested under her daughter’s name and received medication intended for her daughter while in jail. The complaint named numerous public and private defendants but generally did not connect specific defendants to particular conduct.

PROCEDURAL HISTORY

Burchfield sued state employees, judges, governmental entities, police departments, a jail, and private organizations concerning her daughter’s removal from custody and alleged mistreatment. The court granted in forma pauperis status, liberally construed the complaint, and concluded that claims asserted on the daughter’s behalf failed for lack of standing and that the claims against the individual defendants and entities failed because of immunity, lack of personal involvement, lack of suable-entity status, failure to plead municipal policy or custom, or lack of state action. The court dismissed the complaint without prejudice and denied the later motion to update or amend because it did not comply with local pleading requirements and concerned a separate occurrence.

DISPOSITION

dismissed

CASES CITED

- *Ashcroft v. Iqbal*, 556 U.S. 662, 678–79 (2009)

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555–56 (2007)
- Barton v. Taber, 820 F.3d 958, 964 (8th Cir. 2016)
- White v. Clark, 750 F.2d 721, 722 (8th Cir. 1984) (per curiam)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015)
- Stone v. Harry, 364 F.3d 912, 914–15 (8th Cir. 2004)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980)
- McNeil v. United States, 508 U.S. 106, 113 (1993)
- Crozier for A.C. v. Westside Cmty. Sch. Dist., 973 F.3d 882, 887 (8th Cir. 2020)
- Delorme v. U.S., 354 F.3d 810, 815 (8th Cir. 2004)
- Warth v. Seldin, 422 U.S. 490, 499 (1975)
- S.D. Farm Bureau, Inc. v. Hazeltine, 340 F.3d 583, 591 (8th Cir. 2003)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Will v. Mich. Dep’t of State Police, 491 U.S. 58, 64, 71 (1989)
- Alsbrook v. City of Maumelle, 184 F.3d 999, 1005 (8th Cir. 1999)
- Woodworth v. Hulshof, 891 F.3d 1083, 1090 (8th Cir. 2018)
- Mireles v. Waco, 502 U.S. 9, 11–12 (1991)
- Scheffler v. Trachy, 821 F. App’x 648, 653 (8th Cir. 2020)
- S.A.A. v. Geisler, 127 F.4th 1133, 1139–40 (8th Cir. 2025)
- Ketchum v. City of W. Memphis, 974 F.2d 81, 82 (8th Cir. 1992)
- Owens v. Scott Cnty. Jail, 328 F.3d 1026, 1027 (8th Cir. 2003)
- Monell v. Dep’t of Soc. Servs., 436 U.S. 658, 690 (1978)
- Kelly v. City of Omaha, 813 F.3d 1070, 1075 (8th Cir. 2016)
- Mick v. Raines, 883 F.3d 1075, 1079 (8th Cir. 2018)
- Marsh v. Phelps Cnty., 902 F.3d 745, 751 (8th Cir. 2018)
- Lugar v. Edmondson Oil Co., 457 U.S. 922, 936–37 (1982)
- Troxel v. Granville, 530 U.S. 57, 65 (2000)
- Mitchell v. Dakota Cnty. Soc. Servs., 959 F.3d 887, 897 (8th Cir. 2020)
- Miller v. Norris, 247 F.3d 736, 739 (8th Cir. 2001)
- IDT Corp. v. eBay, 709 F.3d 1220, 1222–23 (8th Cir. 2013)
- Nixon v. Warner Commc’ns, Inc., 435 U.S. 589, 597–98 (1978)
- Leucadia, Inc. v. Applied Extrusion Techs., Inc., 998 F.2d 157, 161 (3d Cir. 1993)

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