

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

Sharon-Shawn A. Bell v. Herb Chambers, et al.

Bell v. Chambers · No. 25-CV-13738-AK · Decided April 16, 2026

SUMMARY

The United States District Court for the District of Massachusetts dismissed Sharon-Shawn A. Bell's amended complaint against Herb Chambers Lincoln of Norwood and its employees. The court held that Bell failed to state a claim under Title III of the Americans with Disabilities Act or 42 U.S.C. § 1983, while dismissing any state-law claims without prejudice.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Angel Kelley
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	April 16, 2026
DOCKET	25-CV-13738-AK
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff proceeding in forma pauperis filed an amended complaint after the court ordered her to amend following an earlier determination that federal-question and diversity jurisdiction were deficient. The district court screened the amended complaint under 28 U.S.C. § 1915(e)(2) and dismissed the action.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court screened the in forma pauperis complaint and could dismiss it if frivolous, malicious, failed to state a claim, or sought relief from an immune defendant. The court also reviewed subject-matter jurisdiction sua sponte and applied the Rule 8(a)(2) and plausibility standards from Twombly and Iqbal.
PRECEDENTIAL VALUE	Unknown
PARTIES	Sharon-Shawn A. Bell v. Herb Chambers, et al.

TOPICS

subject matter jurisdiction

civil procedure

ada / disability

public accommodations discrimination

section 1983

PRACTICE AREAS

civil procedure

civil rights

Americans with Disabilities Act

consumer protection

QUESTIONS PRESENTED

1. Whether the amended complaint stated a claim under Title III of the Americans with Disabilities Act based on the dealership's refusal to conduct the vehicle buyback at a location convenient to Bell.
2. Whether the amended complaint stated a claim under 42 U.S.C. § 1983 based on the dealership and its employees' alleged conduct.
3. Whether the action should be dismissed under 28 U.S.C. § 1915(e)(2) for failure to state a federal claim and whether any state-law claims should remain in federal court.

HOLDINGS

1. Bell failed to state a Title III ADA claim because she did not identify a disability, did not allege that she was unable to travel to the dealership because of a disability, and did not explain how the absence of a requested accommodation denied her dealership services.
2. Bell failed to state a § 1983 claim because the dealership and its employees were private actors and the amended complaint did not allege conduct fairly attributable to the State or action under color of state law.
3. The action was dismissed because the amended complaint failed to state a claim arising under federal law upon which relief could be granted; the dismissal was without prejudice to Bell's state-law claims.

KEY QUOTATIONS

“The dismissal is without prejudice as to any state law claims, which Bell may litigate in the appropriate state court should she choose to do so.” (Section III)

FACTUAL BACKGROUND

In October 2025, Bell purchased a used vehicle from the dealership that she alleged turned out to be a “Lemon.” The dealership delivered the vehicle to her home to collect payment, but allegedly required her to bring the title to the Norwood dealership to complete a buyback and refused to conduct the transaction at a Boston Registry of Motor Vehicles office. Bell alleged that the dealership was not accessible by the MBTA and that transportation by Uber or Lyft would cost approximately \$200, but she did not identify a disability or explain how the dealership's conduct denied her services because of a disability.

PROCEDURAL HISTORY

Bell sued Herb Chambers Lincoln of Norwood Dealership and its employees concerning the purchase and attempted return of a used automobile. On January 15, 2026, the court concluded that Bell had failed to state a

federal claim and that diversity of citizenship did not appear to exist, and it permitted her to file an amended complaint. After reviewing the amended complaint, the court dismissed the federal claims and dismissed the action without prejudice as to any state-law claims.

DISPOSITION

dismissed

CASES CITED

- *McCulloch v. Velez*, 364 F.3d 1, 5 (1st Cir. 2004)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555, 557, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *G. v. Fay Sch.*, 931 F.3d 1, 9 (1st Cir. 2019)
- *Cruz-Arce v. Mgmt. Admin. Servs. Corp.*, 19 F.4th 538, 543 (1st Cir. 2021)
- *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982)

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