

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MISSOURI, CENTRAL DIVISION

Michael Mayfield v. Jill Schlude, et al.

Mayfield · No. 25-04200-CV-C-BP · Decided January 16, 2026

SUMMARY

The United States District Court for the Western District of Missouri revoked Michael Mayfield’s provisional in forma pauperis status after he failed to file an amended complaint addressing deficiencies identified by the Court. The Court dismissed the case without prejudice under 28 U.S.C. § 1915(e)(2), finding that the complaint was too conclusory and vague to state a claim or identify unlawful conduct by each defendant.

CASE DETAILS

COURT	United States District Court for the Western District of Missouri, Central Division
WRITING FOR THE COURT	Beth Phillips
JURISDICTION	United States District Court for the Western District of Missouri, Central Division
DECIDED	January 16, 2026
DOCKET	25-04200-CV-C-BP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff proceeded pro se and sought leave to proceed in forma pauperis. After transferring the case to the Western District of Missouri, the court ordered Plaintiff to file an amended complaint addressing deficiencies and warned that failure to do so would result in revocation of in forma pauperis status. Plaintiff did not amend, and the court revoked that status and dismissed the case without prejudice.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court may deny or revoke in forma pauperis status at any time and must dismiss an action that is frivolous, fails to state a claim, or seeks monetary relief from an immune defendant. The court applied the Rule 12(b)(6) plausibility standard through § 1915(e)(2)(B)(ii), requiring sufficient factual content to support a reasonable inference of liability, and noted that the frivolousness standard is higher than the Rule 12(b)(6) standard.

PRECEDENTIAL VALUE	unpublished district court order; precedential status not designated in the document
PARTIES	Michael Mayfield v. Jill Schlude, et al.

TOPICS

pleadings motions to dismiss civil procedure section 1983 ada / disability

PRACTICE AREAS

civil procedure civil rights in forma pauperis screening pleading sufficiency

QUESTIONS PRESENTED

1. Whether the court could revoke Plaintiff's previously granted in forma pauperis status after determining that the complaint did not satisfy the statutory requirements.
2. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2)(B) because it was conclusory and failed to state a plausible claim identifying the unlawful actions of each defendant.

HOLDINGS

1. A court may revoke or withdraw in forma pauperis status at any time when the statutory standards for proceeding without prepayment of fees are not met.
2. The complaint failed to state a claim because it was too conclusory and vague to identify what illegal action each defendant allegedly took, how that action caused harm, or how the alleged conduct violated Plaintiff's civil rights.

KEY QUOTATIONS

“A complaint is frivolous under § 1915(e)(2)(B)(i) if there is “indisputably absent any factual or legal basis for the wrong asserted in the complaint.”” (2)

“Under that standard, a complaint must contain sufficient factual content to allow the court to draw the reasonable inference (and more than a sheer possibility) that the defendant is liable for the misconduct alleged.” (2)

“Without being more specific about each Defendant’s actions and how each action caused harm to Plaintiff, the Complaint is too conclusory and vague to be proper.” (3)

FACTUAL BACKGROUND

Plaintiff alleged that he was disabled, lived in federally funded housing, and that his civil rights were being violated. He asserted that individuals associated with multiple government agencies were conspiring against him but did not identify the circumstances or objective of the alleged conspiracy. He also described personal difficulties without explaining how any particular defendant caused them or what specific conduct constituted a civil rights violation.

PROCEDURAL HISTORY

In August 2025, Judge Henry E. Autrey of the Eastern District of Missouri provisionally granted Plaintiff leave to proceed in forma pauperis and transferred the action to the Western District of Missouri. The court later ordered Plaintiff to file an amended complaint by December 30, 2025, but Plaintiff failed to do so. The court determined that the complaint lacked sufficient factual and legal allegations, revoked in forma pauperis status, and dismissed the case without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Heimermann v. Global Sec. Tr. Co.*, 132 F.3d 36 (7th Cir. 1997)
- *Oughton v. United States*, 310 F.2d 803, 804 (10th Cir. 1962)
- *Martin-Trigona v. Stewart*, 691 F.2d 856, 858 (8th Cir. 1982)
- *Williams v. White*, 897 F.2d 942, 943 (8th Cir. 1990)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Horras v. American Capital Strategies, Ltd.*, 729 F.3d 798, 801 (8th Cir. 2013)
- *Green v. White*, 616 F.2d 1054, 1055 (8th Cir. 1980)
- *Straeten v. Potosi Corr. Ctr.*, 2009 WL 4894550, at *4 (W.D. Mo. Dec. 17, 2009)
- *Downey v. United States*, 2019 WL 13258141, at *2 (W.D. Mo. July 30, 2019)

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