

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

McKeeman v. Bush

McKeeman v. Bush · No. Civil Action No. 26-1228 (UNA) · Decided June 3, 2026

SUMMARY

The United States District Court for the District of Columbia grants the plaintiff's application to proceed in forma pauperis but dismisses the pro se complaint without prejudice. The court concludes that the complaint lacks factual allegations supporting a legal claim, a basis for subject-matter jurisdiction, and a demand for relief, and therefore fails to satisfy Federal Rule of Civil Procedure 8(a).

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Christopher R. Cooper
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 3, 2026
DOCKET	Civil Action No. 26-1228 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court considered plaintiff's application to proceed in forma pauperis and her pro se complaint.
STANDARD OF REVIEW	A pro se complaint is held to a less stringent standard than a pleading drafted by a lawyer, but it must still comply with the Federal Rules of Civil Procedure and satisfy Rule 8(a)'s pleading requirements.
PRECEDENTIAL VALUE	published district court memorandum opinion

TOPICS

- pleadings
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

- civil procedure
- federal pleading practice

QUESTIONS PRESENTED

1. Whether the pro se complaint satisfied Federal Rule of Civil Procedure 8(a)'s requirements for a short and plain statement of jurisdiction, a claim showing entitlement to relief, and a demand for judgment.

2. Whether the complaint should be dismissed without prejudice for failing to plead facts supporting a legal claim and for failing to establish subject matter jurisdiction.

HOLDINGS

1. Although pro se pleadings are held to a less stringent standard, a pro se litigant must comply with the Federal Rules of Civil Procedure, including Rule 8(a).
2. The complaint failed to satisfy Rule 8(a) because it contained no factual allegations supporting an actual legal claim, no statement establishing subject matter jurisdiction, and no demand for relief; dismissal without prejudice was therefore proper.

KEY QUOTATIONS

“The Court dismisses the complaint for the simple reason that there are no factual allegations supporting an actual legal claim.”

“As drafted, the complaint falls well short of Rule 8’s minimal pleading standard, and the Court will dismiss it without prejudice.”

FACTUAL BACKGROUND

The plaintiff filed a pro se complaint against Steven Bush and other defendants. The complaint contained no factual allegations supporting an actual legal claim, no statement demonstrating that the court had subject matter jurisdiction, and no demand for relief.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint and an application to proceed in forma pauperis. The court granted the application but dismissed the complaint without prejudice because it lacked factual allegations supporting a legal claim, a statement establishing subject matter jurisdiction, and a demand for relief.

DISPOSITION

dismissed

CASES CITED

- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Jarrell v. Tisch, 656 F. Supp. 237, 239 (D.D.C. 1987)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Brown v. Califano, 75 F.R.D. 497, 498 (D.D.C. 1977)