UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Moorefield v. JP Morgan Chase Bank, N.A.

Moorefield · No. 26-289 · Decided March 23, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania overruled Michael Moorefield’s objections and adopted the magistrate judge’s report and recommendation. The court dismissed with prejudice his claims against JPMorgan Chase Bank, N.A. concerning denial of a credit card application under the Fair Credit Reporting Act, denied leave to amend as futile, and entered judgment accordingly.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Nora Barry Fischer
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	March 23, 2026
DOCKET	26-289
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court reviewed de novo a magistrate judge's report and recommendation following preservice screening of a pro se plaintiff's in forma pauperis complaint.
STANDARD OF REVIEW	De novo review of the report and recommendation and independent review of the record.
PRECEDENTIAL VALUE	unpublished district court memorandum order; precedential status unknown
PARTIES	Michael Moorefield v. JP Morgan Chase Bank, N.A.

TOPICS

motions to dismiss · consumer protection · statutory interpretation · pleadings · civil procedure

PRACTICE AREAS

Fair Credit Reporting Act | Equal Credit Opportunity Act | consumer credit | federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a viable private claim under 15 U.S.C. § 1681m.
2. Whether the court properly denied leave to amend because proposed claims under the Equal Credit Opportunity Act and additional Fair Credit Reporting Act provisions would be futile.
3. Whether the court properly conducted preservice screening and liberally construed the pro se complaint.

HOLDINGS

1. The complaint was properly dismissed because 15 U.S.C. § 1681m does not provide a private cause of action.
2. Leave to amend to assert an Equal Credit Opportunity Act claim was properly denied as futile because Chase's adverse-action reasons were sufficiently specific under the applicable statutory and regulatory standards.
3. Leave to amend to add claims under the cited Fair Credit Reporting Act provisions was properly denied as futile.
4. The court properly liberally construed the pro se allegations and screened the in forma pauperis complaint before service.

FACTUAL BACKGROUND

Moorefield applied for a Chase Freedom consumer credit card on September 8, 2025. Chase obtained and used a credit report to evaluate the application and denied credit, citing insufficient established consumer credit history and a lack of information about balances in his bank deposit accounts. Moorefield claimed that the stated reasons were vague and asserted that he could amend to add claims under the Equal Credit Opportunity Act and additional Fair Credit Reporting Act provisions.

PROCEDURAL HISTORY

Moorefield filed a complaint alleging that JP Morgan Chase Bank violated the Fair Credit Reporting Act by denying his credit card application. After granting in forma pauperis status, the magistrate judge recommended dismissal with prejudice under 28 U.S.C. § 1915(e)(2)(B)(ii) and denial of leave to amend as futile. Moorefield timely objected, and the district court overruled the objections, adopted the report and recommendation as supplemented, dismissed the complaint with prejudice, and denied leave to amend.

DISPOSITION

dismissed

CASES CITED

- Haines v. Kerner, 404 U.S. 519, 520 (1972)

- Fletcher-Harlee Corp. v. Pote Concrete Contractors, Inc., 482 F.3d 247, 251 (3d Cir. 2007)
- Dieffenbach v. RBS Citizens, N.A., 514 F. App’x 125, 127–28 (3d Cir. 2013)
- Huertas v. Citigroup, Inc., 639 F. App’x 798, 800 (3d Cir. 2016)
- Gelman v. State Farm Mut. Auto. Ins. Co., 583 F.3d 187, 191 (3d Cir. 2009)
- Cortez v. Trans Union, LLC, 617 F.3d 688, 707 (3d Cir. 2010)
- Bibbs v. Trans Union LLC, 43 F.4th 331, 344–45 (3d Cir. 2022)
