

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Cabrera v. London Africa Ltd.

Cabrera · No. 25-4032 (UNA) · Decided January 21, 2026

SUMMARY

The United States District Court for the District of Columbia grants Vincent Cabrera’s application to proceed in forma pauperis. The court dismisses his pro se complaint without prejudice because it contains only two factual allegations and fails to satisfy Federal Rule of Civil Procedure 8(a), including the requirement to state a claim and demand relief.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Loren L. AliKhan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 21, 2026
DOCKET	25-4032 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court considered Plaintiff's application to proceed in forma pauperis and his pro se complaint.
STANDARD OF REVIEW	The court applied the pleading standard under Federal Rule of Civil Procedure 8(a), while construing the pro se complaint under the less stringent standards applicable to pro se litigants.
PRECEDENTIAL VALUE	published
PARTIES	Vincent Cabrera v. London Africa Ltd.

TOPICS

- pleadings
- civil procedure

PRACTICE AREAS

- civil procedure

QUESTIONS PRESENTED

1. Whether the pro se complaint satisfied Federal Rule of Civil Procedure 8(a)'s requirement of a short and plain statement of jurisdiction, entitlement to relief, and the relief sought.
2. Whether the plaintiff should be permitted to proceed in forma pauperis.

HOLDINGS

1. The court granted Cabrera's application to proceed in forma pauperis.
2. The complaint failed to satisfy Rule 8(a)'s minimal pleading standard because it contained only two inadequate factual allegations and demanded no relief; the complaint was therefore dismissed without prejudice.

KEY QUOTATIONS

“Complaints filed by pro se litigants are held to “less stringent standards” than those applied to pleadings drafted by lawyers.” (at 2)

“As drafted, the complaint falls far short of Rule 8’s minimal pleading standard.” (at 2)

FACTUAL BACKGROUND

The complaint contained only two factual allegations: “Slave trade through Puerto [R]ico” and “Mental health issues.” The complaint did not demand any relief.

PROCEDURAL HISTORY

Vincent Cabrera filed a pro se complaint and an application to proceed in forma pauperis. The district court granted the application but dismissed the complaint without prejudice because it failed to satisfy Federal Rule of Civil Procedure 8(a).

DISPOSITION

dismissed

CASES CITED

- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Jarrell v. Tisch, 656 F. Supp. 237, 239 (D.D.C. 1987)

OPINION

Cabrera v. London Africa Ltd

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

VINCENT CABRERA,

Plaintiff, v. Civil Action No. 25 - 4032 (UNA)

LONDON AFRICA LTD,

Defendant.

MEMORANDUM OPINION

This matter is before the court on Plaintiff Vincent Cabrera's application to proceed in forma pauperis, ECF No. 2, and pro se complaint, ECF No. 1. For the reasons explained below, the court will grant Mr. Cabrera's application and dismiss the complaint without prejudice. Complaints filed by pro se litigants are held to "less stringent standards" than those applied to pleadings drafted by lawyers. *Haines v. Kerner*, 404 U.S. 519, 520 (1972) (per curiam). Still, pro se litigants must comply with the Federal Rules of Civil Procedure. *Jarrell v. Tisch*, 656 F. Supp. 237, 239 (D.D.C. 1987). Rule 8(a) of the Federal Rules of Civil Procedure requires that a complaint contain a short and plain statement of the grounds upon which the court's jurisdiction depends, a short and plain statement of the claim showing that the pleader is entitled to relief, and a demand for judgment for the relief the pleader seeks. Fed. R. Civ. P. 8(a). Mr. Cabrera's complaint contains only two factual allegations: "Slave trade through Puerto [R]ico" and "Mental health issues," ECF No. 1, at 4, and Mr. Cabrera fails to demand relief of any kind, see *id.* at 4-5. As drafted, the complaint falls far short of Rule 8's minimal pleading standard. Accordingly, the court will grant Mr. Cabrera's application to proceed in forma pauperis, ECF No. 2, and dismiss the complaint without prejudice, ECF No. 1. A contemporaneous order will issue.

LOREN L. ALIKHAN

United States District Judge Date: January 21, 2026 2