

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Christopher-Michael Williams v. A Corporation d/b/a
Writeaprisoner.com, et al.

Williams v. A Corporation · No. 2:25-cv-00154 · Decided January 28, 2026

SUMMARY

The United States Magistrate Judge screens a pro se prisoner's Second Amended Complaint alleging that private defendants discriminated against him by excluding him from a prisoner pen pal program based on race or the offense for which he is imprisoned. The court allows claims under 42 U.S.C. § 1981 and a state-law breach-of-contract claim to proceed, while recommending dismissal of any claims asserted under 42 U.S.C. § 1983 because the defendants were not alleged to be state actors.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Caroline H. Gentry
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	January 28, 2026
DOCKET	2:25-cv-00154
DISPOSITION	other
PROCEDURAL POSTURE	The magistrate judge screened Plaintiff's Second Amended Complaint under 28 U.S.C. §§ 1915 and 1915A. The order permitted Plaintiff's claims under 42 U.S.C. § 1981 and state-law breach of contract to proceed, while recommending dismissal of any remaining or implied claims under 42 U.S.C. § 1983.
STANDARD OF REVIEW	Preliminary screening under 28 U.S.C. §§ 1915 and 1915A; dismissal recommended for failure to state a claim upon which relief may be granted.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Christopher-Michael Williams v. A Corporation d/b/a Writeaprisoner.com, et al.

TOPICS

civil rights

section 1983

pleadings

contracts

fourteenth amendment

PRACTICE AREAS

civil rights

civil procedure

contracts

QUESTIONS PRESENTED

1. Whether Plaintiff's allegations under 42 U.S.C. § 1981 and his state-law breach-of-contract claim should proceed past preliminary screening.
2. Whether any claims in the Second Amended Complaint brought or construed as brought under 42 U.S.C. § 1983 should be dismissed for failure to allege action under color of state law.
3. Whether the Second Amended Complaint superseded the earlier complaints for purposes of screening.

HOLDINGS

1. The Second Amended Complaint was the operative pleading and superseded the earlier complaints for all purposes.
2. Plaintiff's claims under 42 U.S.C. § 1981 and his apparent state-law breach-of-contract claim were permitted to proceed to further development at the screening stage.
3. Any claims in the Second Amended Complaint that were brought or could be construed as brought under 42 U.S.C. § 1983 should be dismissed for failure to state a claim because Plaintiff did not allege that the private defendants acted under color of state law.

KEY QUOTATIONS

"An amended complaint supersedes an earlier complaint for all purposes."

"It protects the equal right of '[a]ll persons within the jurisdiction of the United State' to 'make and enforce contracts' without respect to race."

"A plaintiff generally cannot sue a private individual for violations of his constitutional rights."

FACTUAL BACKGROUND

Plaintiff, a state prisoner, alleged that Writeaprisoner.com and certain co-owners and employees discriminated against him by excluding him from a prisoner pen-pal program based on his race and/or the offense for which he was imprisoned. He primarily sought damages and declaratory relief under 42 U.S.C. § 1981 and also appeared to assert a state-law breach-of-contract claim. He alleged constitutional violations but did not allege that the defendants acted under color of state law or facts establishing that they were state actors.

PROCEDURAL HISTORY

Plaintiff initially filed claims under 42 U.S.C. § 1981, then filed a First Amended Complaint asserting claims under § 1983, and later filed the operative Second Amended Complaint asserting claims under § 1981 against

private defendants. The magistrate judge conducted preliminary screening and concluded that the § 1981 and breach-of-contract claims could proceed, but that any § 1983 claims should be dismissed because the complaint did not allege state action. The document is an order and report and recommendation subject to objections and review by the district judge.

DISPOSITION

other

CASES CITED

- In re Refrigerant Compressors Antitrust Litigation, 731 F.3d 586, 589 (6th Cir. 2013)
- Pacific Bell Telephone Co. v. Linkline Communications, Inc., 555 U.S. 438, 456 n.4 (2009)
- Johnson v. University of Cincinnati, 215 F.3d 561, 574 (6th Cir. 2000)
- Jones v. Mayer, 392 U.S. 409, 422-37 (1968)
- Domino's Pizza, Inc. v. McDonald, 546 U.S. 470, 474 (2006)
- Wheat v. Chase Bank, No. 3:11-cv-309, 2014 WL 457588, at *12 (S.D. Ohio Feb. 3, 2014)
- Christian v. Wal-Mart Stores, Inc., 252 F.3d 862, 867-68 (6th Cir. 2001)
- Harper v. Donehue, No. 2:11-cv-939, 2012 WL 441179, at *1 (S.D. Ohio Feb. 10, 2012)
- Nelson v. Campbell, 541 U.S. 637, 643 (2004)
- Hunt v. Sycamore Community School District Board of Education, 542 F.3d 529, 534 (6th Cir. 2008)
- Weser v. Goodson, 965 F.3d 507, 515-16 (6th Cir. 2020)
- Lindsey v. Detroit Entertainment, LLC, 484 F.3d 824, 827 (6th Cir. 2007)
- Bergeron v. Oakland County, No. 2:24-cv-12236, 2024 WL 4982890, at *4 (E.D. Mich. Dec. 4, 2024)
- American Manufacturers Mutual Insurance Co. v. Sullivan, 526 U.S. 40, 50 (1999)
- Nugent v. Spectrum Juvenile Justice Services, 72 F.4th 135, 139-40 (6th Cir. 2023)
- Carl v. Muskegon County, 763 F.3d 592, 595 (6th Cir. 2014)
- Rendell-Baker v. Kohn, 457 U.S. 830, 837 (1982)
- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. Walters, 638 F.2d 947 (6th Cir. 1981)