

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Michalapoulos v. Schiff

Michalapoulos · No. No. 26-cv-1139 (JMC) · Decided June 29, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed with prejudice St. Stefan Michalapoulos’s amended complaint against Senator Adam Schiff for failure to comply with Federal Rule of Civil Procedure 8(a)(2). The court concluded that the amended filings did not identify a cognizable harm, responsible party, or legal basis for relief, and that further amendment would be futile.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 29, 2026
DOCKET	No. 26-cv-1139 (JMC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	After dismissing Plaintiff's original complaint without prejudice for failure to comply with Federal Rule of Civil Procedure 8(a)(2), the Court construed two subsequent filings as an amended complaint and dismissed the amended complaint with prejudice.
STANDARD OF REVIEW	The Court evaluated the sufficiency of the pleadings under Federal Rule of Civil Procedure 8(a)(2) and considered whether further amendment could possibly cure the deficiencies.
PRECEDENTIAL VALUE	Published district court memorandum opinion
PARTIES	St. Stefan Michalapoulos v. Senator Adam Schiff

TOPICS

- pleadings
- motions to dismiss
- civil procedure

PRACTICE AREAS

- civil procedure
- federal pleading

QUESTIONS PRESENTED

1. Whether Plaintiff's post-dismissal filings could be liberally construed as an amended complaint.
2. Whether the amended complaint complied with Federal Rule of Civil Procedure 8(a)(2).
3. Whether the action could be dismissed sua sponte and with prejudice after Plaintiff failed to cure the pleading deficiencies.

HOLDINGS

1. The Court liberally construed Plaintiff's notice of criminal charges and notice of evidence as an amended complaint.
2. The amended complaint failed to comply with Rule 8(a)(2) because it did not identify a cognizable harm, who inflicted it, or how the law entitled Plaintiff to relief.
3. The Court could dismiss the amended complaint sua sponte without further notice where Plaintiff could not possibly obtain relief, and could dismiss the action with prejudice after Plaintiff failed to cure the Rule 8 deficiencies.

KEY QUOTATIONS

“where the claimant cannot possibly win relief,” (2)

FACTUAL BACKGROUND

Plaintiff filed a pro se civil complaint against United States Senator Adam Schiff, but the complaint did not identify a cognizable harm, the person who caused it, or a legal basis for relief. After receiving leave to amend, Plaintiff filed documents alleging court fraud, issues involving an alleged terrorist list, and obstruction by FBI and DOJ investigators, along with what appeared to be a copy of the case docket and prior orders. The Court concluded that these filings still failed to provide a coherent claim for relief.

PROCEDURAL HISTORY

Plaintiff filed a civil complaint on April 2, 2026. On May 13, 2026, the Court dismissed it without prejudice for failure to comply with Rule 8(a)(2) and allowed Plaintiff to amend. Plaintiff subsequently filed a document captioned as a notice of criminal charges and another document labelled evidence. The Court liberally construed those filings as an amended complaint, found that they did not cure the pleading deficiencies, and dismissed the action with prejudice.

DISPOSITION

dismissed

CASES CITED

- Baker v. Director, U.S. Parole Comm’n, 916 F.2d 725, 726 (D.C. Cir. 1990)
- Brown v. WMATA, 164 F. Supp. 3d 33, 35 (D.D.C. 2016)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ST. STEFAN MICHALOPOULOS, Plaintiff, Case No. 26-cv-1139 (JMC) v. SENATOR ADAM SCHIFF, Defendant. MEMORANDUM OPINION On April 2, 2026, pro se Plaintiff St. Stefan Michalopoulos filed a civil complaint against United States Senator Adam Schiff. ECF 1.

On May 13, 2026, this Court dismissed his complaint without prejudice for failure to comply with Federal Rule of Civil Procedure 8(a)(2). ECF 16; ECF 17. The Court allowed Plaintiff until June 12, 2026, to file “an amended complaint that cures the existing deficiencies.” ECF 16 at 2.

On June 11, 2026, Plaintiff filed a docket captioned “Notice of Criminal Charges to Jia M. Cobb.” ECF 21. On June 22, 2026, Plaintiff filed another document that he labelled “evidence.” ECF 22 at 1. The Court will liberally construe these two documents as Plaintiff’s amended complaint. Neither filing remedies the defects of the original complaint. Like the previously dismissed the complaint, the Court remains unable to identify what cognizable harm Michalopoulos has suffered, who inflicted that harm, and how the law entitles him to relief.

He accuses President Trump of “court fraud,” mentions a “terrorist list for [his] court proceedings for all [his] 200,000 ICE lawsuits,” and alludes to “FBI and DOJ investigators obstructing” him. ECF 21 at 2. And the “notice of evidence” Plaintiff filed appears to be a copy of the docket from this case along with the Court’s prior orders. ECF 22. At bottom, the Court does not find that further opportunities to amend will save Plaintiff’s claims.

In these circumstances, 1 “where the claimant cannot possibly win relief,” the Court may dismiss a complaint “sua sponte without notice.” *Baker v. Director, U.S. Parole Comm’n*, 916 F.2d 725, 726 (D.C. Cir. 1990). Michalopoulos’s amended complaint is therefore DISMISSED for failure to comply with Rule 8(a)(2) for largely the same reasons stated in this Court’s prior opinion.

See ECF 16 at 2. And as noted in the Court’s prior opinion, because Plaintiff failed to file an amended complaint that comports with Rule 8, this action shall be DISMISSED WITH PREJUDICE. *Id.* at 2–3 (citing *Brown v. WMATA*, 164 F. Supp. 3d 33, 35 (D.D.C. 2016)). A separate order accompanies this memorandum opinion. SO ORDERED.

JIA M. COBB United States District Judge Date: June 29, 2026 2