

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

McKeeman v. Chany

Civil Action No. 26-1273 (UNA) (D.D.C. June 1, 2026) · No. Civil Action No. 26-1273 (UNA) · Decided June 1, 2026

SUMMARY

The U.S. District Court for the District of Columbia grants Rita McKeeman’s application to proceed in forma pauperis but dismisses her pro se complaint without prejudice. The court finds that the complaint lacks factual allegations supporting a legal claim or federal jurisdiction and does not include a demand for relief, failing 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 1, 2026
DOCKET	Civil Action No. 26-1273 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se complaint and an application to proceed in forma pauperis. The district court granted the in forma pauperis application and dismissed the complaint without prejudice.
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. Under Rule 8(a), the complaint must provide a short and plain statement of the grounds for jurisdiction, a short and plain statement showing entitlement to relief, and a demand for the relief sought.
PRECEDENTIAL VALUE	Published memorandum opinion; no reporter citation or precedential designation appears in the text.

TOPICS

- pleadings
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the pro se complaint satisfied Federal Rule of Civil Procedure 8(a)'s requirements for pleading jurisdiction, a claim showing entitlement to relief, and a demand for judgment.
2. Whether the complaint should be dismissed without prejudice for failing to state factual allegations supporting a legal claim or the court's jurisdiction.

HOLDINGS

1. A pro se complaint must comply with Federal Rule of Civil Procedure 8(a), including the requirements to state the grounds for jurisdiction, allege facts showing entitlement to relief, and demand the relief sought.
2. A complaint that fails to allege facts supporting a legal claim or the court's jurisdiction and fails to demand relief may be dismissed without prejudice for failure to satisfy Rule 8(a).

KEY QUOTATIONS

“The Court dismisses the complaint for the simple reason that there are no factual allegations supporting an actual legal claim, see Compl. at 4, or this Court’s jurisdiction over it, see id. at 3.” (1)

“As drafted, the complaint falls well short of Rule 8’s minimal pleading standard, and the Court will dismiss it without prejudice.” (1)

FACTUAL BACKGROUND

The plaintiff filed a pro se complaint that contained no factual allegations supporting an actual legal claim or the district court's jurisdiction. The complaint also lacked a demand for relief.

PROCEDURAL HISTORY

The action was initiated by a pro se complaint accompanied by an application to proceed in forma pauperis. The district court granted the application but dismissed the complaint without prejudice because it contained no factual allegations supporting a legal claim or the court's jurisdiction and requested no 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)

OPINION

McKeeman v. Chaney

PER CURIAM.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RITA McKEEMAN,)

) Plaintiff,)) v.) Civil Action No. 26-1273 (UNA))) DICK CHANY, et al.,)) Defendants.)

MEMORANDUM OPINION

This matter is before the court on plaintiff's application to proceed in forma pauperis, ECF No. 2, and pro se complaint, ECF No. 1. The Court grants the application and dismisses the complaint without prejudice. The Court holds a pro se complaint to a "less stringent standard[]" than is applied to a pleading drafted by a lawyer. *Haines v. Kerner*, 404 U.S. 519, 520 (1972). Still, a pro se litigant 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). It "does not require detailed factual allegations, but it demands more than an unadorned, the-defendant-unlawfully-harmed-me accusation." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quotations omitted). The Rule 8 standard ensures that defendants receive fair notice of the claim being asserted so that they can prepare a responsive answer, mount an adequate defense, and determine whether the doctrine of res judicata applies. See *Brown v. Califano*, 75 F.R.D. 497, 498 (D.D.C. 1977). 1 The Court dismisses the complaint for the simple reason that there are no factual allegations supporting an actual legal claim, see Compl. at 4, or this Court's jurisdiction over it, see id. at 3. Missing, too, is a demand for relief. See id. at 4. As drafted, the complaint falls well short of Rule 8's minimal pleading standard, and the Court will dismiss it without prejudice. A separate order accompanies this Memorandum Opinion. DATE: June 1, 2026 /s/

CHRISTOPHER R. COOPER

United States District Judge 2