

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH,
CENTRAL DIVISION

Brown v. Utah County Jail

Brown · No. 2:24-cv-00200-DBB-CMR · Decided March 13, 2026

SUMMARY

The document is a Report and Recommendation addressing Defendant Utah County Jail’s motion for judgment on the pleadings in Robert Louis Brown’s action concerning his placement on suicide watch. The magistrate judge recommends granting the motion and dismissing the complaint because Utah County Jail lacks capacity to be sued and was the only named defendant.

CASE DETAILS

COURT	United States District Court for the District of Utah, Central Division
WRITING FOR THE COURT	Cecilia M. Romero
JURISDICTION	United States District Court for the District of Utah, Central Division
DECIDED	March 13, 2026
DOCKET	2:24-cv-00200-DBB-CMR
DISPOSITION	other
PROCEDURAL POSTURE	Magistrate judge report and recommendation on Defendant's motion for judgment on the pleadings in a civil-rights action.
STANDARD OF REVIEW	A motion for judgment on the pleadings is reviewed under the standard applicable to a Rule 12(b)(6) motion. The court accepts the nonmoving party's pleaded facts as true, draws reasonable inferences in that party's favor, and asks whether the complaint states a facially plausible claim for relief.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Robert Louis Brown v. Utah County Jail

TOPICS

- motion for judgment on the pleadings
- civil procedure
- pleadings
- civil rights
- municipal liability

PRACTICE AREAS

- civil rights
- civil procedure
- constitutional law

QUESTIONS PRESENTED

1. Whether Utah County Jail has the capacity to be sued under Utah law.
2. Whether the complaint stated a plausible claim for relief when Utah County Jail was the only named defendant.
3. Whether Defendant was entitled to judgment on the pleadings and dismissal of the complaint.

HOLDINGS

1. Under Utah law, a county may sue or be sued, but a county subdivision such as a county jail lacks capacity to be sued absent statutory or case authority supporting such an action.
2. The complaint failed to state a plausible claim for relief because its only named defendant, Utah County Jail, was an entity that could not be sued.

KEY QUOTATIONS

“Motions for Judgment on the Pleadings are reviewed “under the standard of review applicable to a Rule 12(b)(6) motion to dismiss.””

“Therefore, “[i]n reviewing a motion to dismiss, this court must look for plausibility in the complaint. Under this standard, a complaint must include enough facts to state a claim to relief that is plausible on its face.””

FACTUAL BACKGROUND

Robert Louis Brown alleged that he was booked into the Utah County Jail on February 21, 2024, and was wrongly placed on suicide watch in violation of the Fifth Amendment. Utah County Jail was the only named and served defendant. The deadlines for fact discovery and for amending the pleadings or joining additional parties had expired.

PROCEDURAL HISTORY

Plaintiff filed suit alleging that he was improperly placed on suicide watch after being booked into the Utah County Jail, asserting a Fifth Amendment violation. The matter was referred to Magistrate Judge Cecilia M. Romero under 28 U.S.C. § 636(b)(1)(B). The only named and served defendant was Utah County Jail, which moved for judgment on the pleadings; the magistrate judge recommended granting the motion and dismissing the complaint, subject to the parties' right to object.

DISPOSITION

other

CASES CITED

- Garrett v. Selby, Connor, Maddux & Janer, 425 F.3d 836, 840 (10th Cir.)
- Nielsen v. Price, 17 F.3d 1276, 1277 (10th Cir.)
- Corder v. Lewis Palmer School District No. 38, 566 F.3d 1219, 1223 (10th Cir.)

- Nelson v. State Farm Mut. Auto. Ins. Co., 419 F.3d 1117, 1119 (10th Cir.)
- Teigen v. Renfrow, 511 F.3d 1072, 1078 (10th Cir.)
- Robbins v. Oklahoma, 519 F.3d 1242, 1247 (10th Cir.)
- Colony Ins. Co. v. Burke, 698 F.3d 1222, 1228 (10th Cir.)
- Park Univ. Enters. v. Am. Cas. Co., 442 F.3d 1239, 1244 (10th Cir.)
- White v. Utah, 5 F. Appx. 852, 853 (10th Cir.)

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