

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Tiffany Jamil Flenaugh v. Greater Lakes Mental Healthcare

Flenaugh · No. 3:25-cv-06106-DGE · Decided December 23, 2025

SUMMARY

The United States District Court for the Western District of Washington dismissed Tiffany Jamil Flenaugh’s pro se complaint against Greater Lakes Mental Healthcare under 28 U.S.C. § 1915(e)(2) (B)(ii) for failure to state a claim. The court construed the complaint as asserting a disability-discrimination claim under the Americans with Disabilities Act and found that it did not identify the applicable ADA title or plead facts supporting discriminatory motivation or coverage. The court granted leave to amend by January 21, 2026.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David G. Estudillo
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 23, 2025
DOCKET	3:25-cv-06106-DGE
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court sua sponte screened a pro se plaintiff's complaint filed in forma pauperis under 28 U.S.C. § 1915(e)(2)(B).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), an in-forma-pauperis complaint must be dismissed if it is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The failure-to-state-a-claim standard is the same as the Federal Rule of Civil Procedure 12(b)(6) standard.
PRECEDENTIAL VALUE	Nonprecedential district-court order
PARTIES	Tiffany Jamil Flenaugh v. Greater Lakes Mental Healthcare

TOPICS

- ada / disability
- motions to dismiss
- civil rights
- civil procedure

PRACTICE AREAS

Civil procedure

Civil rights

Americans with Disabilities Act

Health law

QUESTIONS PRESENTED

1. Whether the complaint stated a disability-discrimination claim under Title II or Title III of the Americans with Disabilities Act.
2. Whether the complaint should be dismissed sua sponte under 28 U.S.C. § 1915(e)(2)(B)(ii) for failure to state a claim.
3. Whether plaintiff should receive leave to amend.

HOLDINGS

1. The complaint failed to state a claim under Titles II or III of the ADA because it did not allege facts supporting disability discrimination, disability-based discriminatory animus, or the nature of the defendant as a public entity, private entity, or place of public accommodation.
2. The complaint was subject to sua sponte dismissal under 28 U.S.C. § 1915(e)(2)(B)(ii) because it failed to state a claim upon which relief could be granted.
3. Leave to amend was granted because this was plaintiff's first complaint and the court could not determine with certainty that amendment would be futile without reviewing a proposed amended complaint.

KEY QUOTATIONS

“The standard for determining whether [a] Plaintiff has failed to state a claim upon which relief can be granted under § 1915(e)(2)(B)(ii) is the same as the Federal Rule of Civil Procedure 12(b)(6) standard for failure to state a claim.” (Opinion at 2)

“While district courts must liberally construe pro se filings, especially in civil rights cases, they “may not supply essential elements of the claim that were not initially pled.”” (Opinion at 3)

FACTUAL BACKGROUND

Plaintiff alleged that providers at Greater Lakes Mental Healthcare misrepresented the availability of residential treatment facilities, failed to provide a requested culturally appropriate provider, and were involved in communications concerning her probation status. She alleged that she has a disability, that the incidents were detrimental to her mental health, and that she felt discriminated against because of her disability. She did not identify the applicable ADA title, specify whether Greater Lakes was a public or private healthcare entity, or plead facts showing that the alleged conduct was motivated by disability-based discriminatory animus.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging that Greater Lakes Mental Healthcare discriminated against her and harmed her mental health. The court construed the allegations as asserting a claim under the Americans with Disabilities

Act. On mandatory screening, the court dismissed the complaint for failure to state a claim but granted leave to amend by January 21, 2026.

DISPOSITION

dismissed

CASES CITED

- Calhoun v. Stahl, 254 F.3d 845, 845 (9th Cir. 2001)
- Lopez v. Smith, 203 F.3d 1122, 1126-1127 (9th Cir. 2000) (en banc)
- Watison v. Carter, 668 F.3d 1108, 1112 (9th Cir. 2012)
- Wilhelm v. Rotman, 680 F.3d 1113, 1121 (9th Cir. 2012)
- Sharkey v. O'Neal, 778 F.3d 767, 770 (9th Cir. 2015)
- Litmon v. Harris, 768 F.3d 1237, 1241 (9th Cir. 2014)
- Missouri ex rel. Koster v. Harris, 847 F.3d 646, 656 (9th Cir. 2017)
- Lockheed Martin Corp. v. Network Solutions, Inc., 194 F.3d 980, 986 (9th Cir. 1999)

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