

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Jeffery Hampton v. Vincent Vantiel, Warden, et al.

Hampton · No. 3:24-cv-01480 · Decided February 11, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee grants Jeffery Hampton’s application to proceed in forma pauperis and assesses the statutory filing fee. On initial review under the Prison Litigation Reform Act, the court dismisses the federal claims concerning failure to protect, deliberate indifference to medical needs, and religious exercise for failure to state a claim. Any state-law claims are dismissed without prejudice, and the court certifies that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	February 11, 2026
DOCKET	3:24-cv-01480
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner proceeding pro se filed a 42 U.S.C. § 1983 complaint, an application to proceed in forma pauperis, and a motion to ascertain the status of the case. The district court granted in forma pauperis status, conducted screening under the Prison Litigation Reform Act, dismissed the federal claims for failure to state a claim, declined supplemental jurisdiction over state-law claims, and certified that an appeal would not be taken in good faith.
STANDARD OF REVIEW	On PLRA screening, the court applies the Rule 12(b)(6) plausibility standard, accepts well-pleaded factual allegations and reasonable inferences as true, liberally construes a pro se complaint, and dismisses claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant.

PRECEDENTIAL VALUE	unpublished
PARTIES	Jeffery Hampton v. Vincent Vantiel, Warden, et al.

TOPICS

[section 1983](#)
[prisoners rights](#)
[motions to dismiss](#)
[cruel and unusual punishment](#)
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PRACTICE AREAS

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[prison conditions](#)
[religious-liberty claims](#)

QUESTIONS PRESENTED

1. Whether the failure-to-protect and unsafe-conditions allegations stated an Eighth Amendment claim when Hampton alleged fear, mental anguish, and emotional distress but no physical injury or actual assault.
2. Whether the medical-care allegations plausibly established deliberate indifference to a serious medical need under the Eighth Amendment.
3. Whether the denial of a bottom-bunk accommodation plausibly established deliberate indifference to a serious medical need.
4. Whether denial of participation in a single Communion service substantially burdened Hampton's religious exercise under the First Amendment or RLUIPA.
5. Whether the court should retain supplemental jurisdiction over the asserted Tennessee-law claims after dismissing all federal claims.

HOLDINGS

1. A prisoner may not recover damages under the Eighth Amendment for fear, mental anguish, or emotional distress arising from allegedly dangerous prison conditions without alleging a compensable physical injury or an actual assault; the complaint therefore failed to state a viable failure-to-protect claim.
2. The complaint failed to state an Eighth Amendment deliberate-indifference claim concerning medical care because the attached records showed that Hampton received medical attention, testing, medication, and ongoing referrals, and his disagreement with the adequacy or timing of treatment did not establish conscious disregard of a serious medical need.
3. The complaint failed to plausibly allege deliberate indifference based on the failure to assign Hampton a bottom bunk because the allegations did not establish that the assigning official knew of the relevant medical need before assigning the available bunks or consciously disregarded Hampton's later grievance.
4. The denial of participation in a single Communion service did not substantially burden Hampton's religious practice and therefore did not state a claim under the First Amendment or RLUIPA.

5. After dismissing all federal claims, the court declined to retain supplemental jurisdiction over the asserted Tennessee-law claims and dismissed those claims without prejudice.

KEY QUOTATIONS

“*‘[I]t is the reasonably preventable assault itself, rather than any fear of assault, that gives rise to a compensable claim under the Eighth Amendment.’*” (Opinion at discussion of Counts One and Two)

“*‘An inmate’s disagreement with the testing and treatment he has received . . . does not rise to the level of an Eighth Amendment violation. Nor does a desire for additional or different treatment . . . suffice to support an Eighth Amendment claim.’*” (Opinion at discussion of Counts Three through Eight and Ten)

“*‘[T]he denial of a religious practice on a single, isolated occasion does not constitute a ‘substantial burden’ and thus does not violate the First Amendment’ or RLUIPA.’*” (Opinion at discussion of Counts Eleven through Fifteen)

FACTUAL BACKGROUND

Hampton, a state inmate at Trousdale Turner Correctional Center, alleged that an officer left a pod door open and allowed inmates from other pods to enter, exposing him to a risk of violence and causing mental anguish and emotional distress. He alleged that prison officials and medical personnel failed to arrange or provide various specialist appointments, made treatment decisions based on cost, and failed to assign him a bottom bunk despite a medical accommodation. He also alleged that he was denied participation in a Communion service on one occasion. He did not allege that he suffered a physical injury from prison violence or that the isolated denial of Communion substantially burdened his religious practice.

PROCEDURAL HISTORY

Hampton filed a civil-rights complaint concerning conditions of confinement at Trousdale Turner Correctional Center. The court granted his application to proceed in forma pauperis and assessed the statutory filing fee in installments. On initial review under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court dismissed the federal claims concerning failure to protect, medical care, and religious exercise, dismissed any Tennessee-law claims without prejudice, and directed entry of judgment.

DISPOSITION

dismissed

CASES CITED

- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Nat’l Rifle Ass’n of Am. v. Vullo, 602 U.S. 175, 181 (2024)
- Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan, 87 F.4th 743, 749 (6th Cir. 2023)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Wurzelbacher v. Jones-Kelley, 675 F.3d 580, 583 (6th Cir. 2012)

- Carl v. Muskegon Cnty., 763 F.3d 592, 595 (6th Cir. 2014)
- Wilson v. Yaklich, 148 F.3d 596, 601 (6th Cir. 1998)
- Farmer v. Brennan, 511 U.S. 825, 842-45 (1994)
- Buchholz v. Meyer Njus Tanick, PA, 946 F.3d 855, 864 (6th Cir. 2020)
- Seabrooks v. Core Civic, No. 3:17-1328, 2019 WL 1015093, at *4 (M.D. Tenn. Mar. 4, 2019), report and recommendation adopted, 2019 WL 1359492 (M.D. Tenn. Mar. 26, 2019)
- Wallace v. Holloway, No. 16-2390-STA-EGB, 2017 WL 4001569, at *7 (W.D. Tenn. Sept. 11, 2017)
- Jackson v. Smith, No. 1:05-CV-834, 2006 WL 118284, at *4 (W.D. Mich. Jan. 13, 2006)
- Jackson v. Herrington, 393 F. App'x 348, 354 (6th Cir. 2010)
- Rhinehart v. Scutt, 894 F.3d 721, 737-40 (6th Cir. 2018)
- Harrison v. Ash, 539 F.3d 510, 518 (6th Cir. 2008)
- Slone v. Lincoln Cnty., Ky., 242 F. Supp. 3d 579, 591 (E.D. Ky. 2017)
- Duane v. Lane, 959 F.2d 673, 677 (7th Cir. 1992)
- Hardy v. Sizer, No. 16-1979, 2018 WL 3244002, at *2-3 (6th Cir. May 23, 2018)
- Bassett v. Nat'l Collegiate Athletic Ass'n, 528 F.3d 426, 430 (6th Cir. 2008)
- Westlake v. Lucas, 537 F.2d 857, 860 n.5 (6th Cir. 1976)
- Dominguez v. Corr. Med. Servs., 555 F.3d 543, 550 (6th Cir. 2009)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Cavin v. Michigan Department of Corrections, Cavin v. Michigan Dep't of Corr., 927 F.3d 455, 458, 460-61 (6th Cir. 2019)
- Torres Arboleda v. O'Banion, No. 2:17-CV-0442-EFB P, 2019 WL 1206826, at *2 (E.D. Cal. Mar. 14, 2019)
- Gunn v. Kentucky D.O.C., No. 5:07CV-P103-R, 2010 WL 2555756, at *4-5 (W.D. Ky. June 18, 2010)
- Cancel v. Mazzuca, 205 F. Supp. 2d 128, 142 (S.D.N.Y. 2002)
- Weser v. Goodson, 965 F.3d 507, 519 (6th Cir. 2020)