

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Jeremy Cordero Crawley v. Rick White, et al.

Crawley · No. 7:24-cv-00040 · Decided May 4, 2026

SUMMARY

The United States District Court for the Western District of Virginia dismissed Jeremy Cordero Crawley’s 42 U.S.C. § 1983 action without prejudice under 28 U.S.C. § 1915A(b)(1). The court held that allegations concerning inadequate cell cleaning and the denial of cleaning supplies did not plausibly establish an objectively sufficiently serious Eighth Amendment conditions-of-confinement violation. The court also found that Crawley’s allegations of exposure to infectious disease, COVID-19 risk, emotional distress, and mental anguish were insufficiently specific or serious.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Robert S. Ballou
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	May 4, 2026
DOCKET	7:24-cv-00040
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983 reviewed under 28 U.S.C. § 1915A; the court dismissed the complaint without prejudice for failure to state a claim.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A(b)(1), accepting well-pleaded allegations as true for purposes of determining whether the complaint plausibly states a claim; factual allegations must raise the right to relief above the speculative level.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court memorandum opinion
PARTIES	Jeremy Cordero Crawley v. Rick White, et al.

TOPICS

prisoners rights

cruel and unusual punishment

section 1983

pleadings

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether Crawley's allegations that prison officials failed to clean his cell and provide cleaning materials plausibly stated an Eighth Amendment conditions-of-confinement claim.
2. Whether the complaint should be dismissed under 28 U.S.C. § 1915A(b)(1) for failure to state a claim.

HOLDINGS

1. The complaint failed to state an Eighth Amendment conditions-of-confinement claim because Crawley did not allege facts showing that the condition of his cell was sufficiently extreme, that he suffered a serious or significant physical or emotional injury, or that he faced a substantial risk of serious harm.
2. The court dismissed the action without prejudice because the complaint failed to state a claim upon which relief could be granted.

KEY QUOTATIONS

“To state an Eighth Amendment conditions of confinement claim, prisoners must satisfy a two-part test.”
(Opinion text)

“His assertion that he is at risk of exposure to unnamed diseases is “entirely speculative” and is therefore “not sufficiently serious to rise to the level of an Eighth Amendment violation.”” (Opinion text)

FACTUAL BACKGROUND

Jeremy Cordero Crawley, a Virginia inmate housed at Red Onion State Prison, alleged that prison officials failed to comply with an internal policy requiring cells to be cleaned twice weekly. He also alleged that officials did not provide requested cleaning supplies. Crawley asserted concern about infectious diseases, particularly COVID-19, and alleged emotional distress and mental anguish, but did not identify a physical injury, a specific infectious disease other than COVID-19, disease spread at the prison, or a heightened personal susceptibility to COVID-19.

PROCEDURAL HISTORY

Crawley filed a § 1983 complaint alleging that prison officials failed to clean his cell twice weekly under an internal policy and failed to provide cleaning materials. Upon statutory screening under 28 U.S.C. § 1915A, the court determined that the allegations did not plausibly establish an objectively sufficiently serious deprivation under the Eighth Amendment and dismissed the action without prejudice.

DISPOSITION

dismissed

CASES CITED

- Doe v. Rosa, 795 F.3d 429, 436 (4th Cir. 2015)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Williams v. Benjamin, 77 F.3d 756, 761 (4th Cir. 1996)
- Hammock v. Watts, 146 F.4th 349, 360 (4th Cir. 2025)
- Rish v. Johnson, 131 F.3d 1092, 1096 (4th Cir. 1997)
- Shakka v. Smith, 71 F.3d 162, 166 (4th Cir. 1995)
- Helling v. McKinney, 509 U.S. 25, 33 (1993)
- Farmer v. Brennan, 511 U.S. 825, 834, 837 (1994)
- Knight v. Woody, No. 3:10-cv-00351, 2012 WL 92526, at *3 (E.D. Va. Jan. 11, 2012)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Mathis v. Burke, No. 7:22-cv-00223, 2022 WL 2383962, at *4 (W.D. Va. July 1, 2022)
- Alston v. Department of Corrections, No. 7:07-cv-00575, 2007 WL 4410770, at *3 (W.D. Va. Dec. 14, 2007)
- Allen v. Sater, No. 7:21-cv-00230, 2022 WL 2806469, at *9 (W.D. Va. July 18, 2022)
- Watson v. Kanode, No. 7:21-cv-00119, 2023 WL 6447318, at *7 (W.D. Va. Sept. 29, 2023)
- Morris v. Western Regional Jail, No. 3:17-cv-01148, 2017 WL 4080698, at *11 (S.D. W.Va. Aug. 22, 2017)
- Morris v. Western Regional Jail, 2017 WL 4078129 (S.D. W.Va. Sept. 14, 2017)