

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Hazeem Bey v. Officer Austin Brewster, et al.

Bey · No. 3:25-CV-49-TAV-DCP · Decided February 6, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee grants Hazeem Bey leave to proceed in forma pauperis and dismisses his amended civil rights complaint. The court concludes that the complaint does not plausibly allege claims involving arrest, excessive force, failure to intervene, denial of medical care, conditions of confinement, due process, equal protection, municipal liability, or related state-law claims. The action concerns events following a January 29, 2025 traffic accident and arrest in Knoxville, Tennessee.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Thomas A. Varlan
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	February 6, 2026
DOCKET	3:25-CV-49-TAV-DCP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed an amended civil-rights complaint under 42 U.S.C. § 1983 and moved to proceed in forma pauperis. The district court granted in forma pauperis status, screened the amended complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the federal claims for failure to state a claim, dismissed the state-law claims without prejudice, and certified that an appeal would not be taken in good faith.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis complaint that is frivolous or malicious, fails to state a claim, or seeks relief from an immune defendant. The Rule 12(b)(6) plausibility standard applies, requiring sufficient factual matter to state a claim that is plausible on its face; conclusory allegations and formulaic recitations of elements are insufficient. Pro se pleadings are liberally construed.

PRECEDENTIAL VALUE	unpublished
PARTIES	Hazeem Bey v. Officer Austin Brewster, Officer John Doe, City of Knoxville, Tennessee, Knox County, Tennessee

TOPICS

section 1983 civil rights motions to dismiss due process municipal liability

PRACTICE AREAS

civil rights constitutional law prisoner and detainee litigation civil procedure municipal liability

QUESTIONS PRESENTED

1. Whether Bey's amended complaint stated plausible Fourth Amendment claims for false arrest, unreasonable seizure, unreasonable search, or excessive force.
2. Whether the amended complaint stated a plausible failure-to-intervene claim against Officer Doe.
3. Whether the amended complaint plausibly alleged denial or delay of medical care under the Fourth or Fourteenth Amendment.
4. Whether the alleged detention conditions stated a Fourteenth Amendment conditions-of-confinement claim.
5. Whether the allegations concerning continued detention, identification records, equal protection, and stigma-plus stated plausible Fourteenth Amendment claims.
6. Whether the City of Knoxville and Knox County could be held municipally liable absent a plausibly alleged underlying constitutional violation.
7. Whether the court should decline supplemental jurisdiction over the state-law claims after dismissing all federal claims.

HOLDINGS

1. A court must dismiss an in forma pauperis complaint that is frivolous or malicious, fails to state a claim, or seeks relief from an immune defendant, applying the Rule 12(b)(6) plausibility standard.
2. The amended complaint failed to plausibly allege that the officers lacked probable cause to arrest Bey or that the vehicle search was unlawful.
3. The amended complaint failed to state a plausible excessive-force claim based on grabbing, handcuffing, and placing Bey in a police vehicle.
4. A failure-to-intervene claim cannot proceed without an underlying constitutional violation, and Bey failed to plausibly allege an unlawful seizure or excessive force.
5. The amended complaint failed to plausibly allege denial or delay of medical care under either the Fourth or Fourteenth Amendment.

6. The allegations of cold temperatures, lack of bedding or furniture, sleeping on a dirty floor, insects, and an unsanitary toilet for approximately sixty-one hours did not plausibly establish an objectively serious deprivation or deliberate indifference.
7. Bey failed to state plausible claims based on allegedly prolonged detention, delayed probable-cause review, misidentification in records, disparate treatment, or being labeled a sovereign citizen.
8. The claims against the City of Knoxville and Knox County failed because the complaint did not plausibly allege an underlying constitutional violation.
9. After dismissing all federal claims, the court properly declined to exercise supplemental jurisdiction over the state-law claims and dismissed them without prejudice.

KEY QUOTATIONS

“Because Plaintiff’s lawsuit seeks redress from governmental officers, and because Plaintiff proceeded in forma pauperis, the district court screened Plaintiff’s complaint as required by §§ 1915A and 1915(e)(2)(B).”

“To survive an initial review, a complaint “must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’”

“A claim under 42 U.S.C. § 1983 requires a plaintiff to establish that a person acting under color of state law deprived him a federal right.”

“No constitutional violation means no municipal liability.”

FACTUAL BACKGROUND

Bey alleged that after his vehicle was rear-ended in Knoxville on January 29, 2025, Officers Austin Brewster and John Doe demanded identification and insurance information, seized and handcuffed him, placed him in a police vehicle, and searched his vehicle. He alleged delayed medical treatment, an involuntary hold at a hospital, and approximately sixty-one hours of confinement in cold and allegedly unsanitary conditions at the Roger D. Wilson Detention Facility. He also alleged that officials recorded him under a different name and treated him adversely because of his claimed Moorish American identity. The court concluded that the allegations lacked sufficient factual detail to make the asserted constitutional violations plausible.

PROCEDURAL HISTORY

Bey initially filed a civil-rights complaint and a motion to proceed in forma pauperis. The court ordered him to file an amended complaint containing a short and plain statement of relevant facts, after which he filed the amended complaint. On screening, the court found that the pleading's factual allegations were insufficiently specific and dismissed all federal claims; it declined supplemental jurisdiction over the state-law claims.

DISPOSITION

dismissed

CASES CITED

- *Floyd v. U.S. Postal Service*, 105 F.3d 274, 275-76 (6th Cir. 1997)
- *Callihan v. Schneider*, 178 F.3d 800 (6th Cir. 1999)
- *Foster v. Cuyahoga Department of Health & Human Services*, 21 F. App'x 239, 240 (6th Cir. 2001)
- *Hill v. Lappin*, 630 F.3d 468, 470-71 (6th Cir. 2010)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 676, 678, 681 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 557, 570 (2007)
- *Haines v. Kerner*, 404 U.S. 519, 520 (1972)
- *Frazier v. Michigan*, 41 F. App'x 762, 764 (6th Cir. 2002)
- *Monell v. Department of Social Services*, 436 U.S. 658, 691, 708 (1978)
- *Kentucky v. Graham*, 473 U.S. 159, 166 (1985)
- *Bey v. Sessler*, No. 23-3421, 2024 WL 2078564, at *2 (6th Cir. Feb. 29, 2024)
- *Voyticky v. Village of Timberlake*, 412 F.3d 669, 677 (6th Cir. 2005)
- *Gardenhire v. Schubert*, 205 F.3d 303, 315 (6th Cir. 2000)
- *Beck v. Ohio*, 379 U.S. 89, 91 (1964)
- *Arizona v. Gant*, 556 U.S. 332, 333-34 (2009)
- *Reed v. Campbell County*, 80 F.4th 734, 747-48 (6th Cir. 2023)
- *Graham v. Connor*, 490 U.S. 386, 388, 396-97 (1989)
- *Branham v. Grinage*, No. 88-1611, 1989 WL 11070, at *1 (6th Cir. Feb. 10, 1989)
- *Boone v. Spurgess*, 385 F.3d 923, 933-35 (6th Cir. 2004)
- *Helphenstine v. Lewis County*, 60 F.4th 305, 317 (6th Cir. 2023)
- *DeShaney v. Winnebago County Department of Social Services*, 489 U.S. 189, 199-200 (1989)
- *Esch v. County of Kent*, 699 F. App'x 509, 514-15 (6th Cir. 2017)
- *Ortiz v. City of Chicago*, 656 F.3d 523, 530-31 (7th Cir. 2011)
- *Vasquez v. Hamtramck*, 757 F.2d 771, 773 (6th Cir. 1985)
- *Patton v. Przybylski*, 822 F.2d 697, 700 (7th Cir. 1987)
- *Lamb v. Howe*, 677 F. App'x 204, 209 (6th Cir. 2017)
- *Spencer v. Bouchard*, 449 F.3d 721, 728 (6th Cir. 2006)
- *Jones v. Bock*, 549 U.S. 199 (2007)
- *Farmer v. Brennan*, 511 U.S. 825, 836 (1994)
- *Hutto v. Finney*, 437 U.S. 678, 686-87 (1978)
- *Graves v. Boyd*, No. 5:16-CV-P51-TBR, 2016 WL 4386102, at *5 (W.D. Ky. Aug. 15, 2016)
- *Goldman v. Forbus*, 17 F. App'x 487, 488 (8th Cir. 2001)
- *Yoder v. Seals*, No. 07-436, 2009 WL 737099, at *3 (E.D. Tenn. Mar. 19, 2009)
- *Grubbs v. Bradley*, 552 F. Supp. 1052, 1122-23 (M.D. Tenn. 1982)
- *County of Riverside v. McLaughlin*, 500 U.S. 44, 55 (1991)
- *Gerstein v. Pugh*, 420 U.S. 103 (1975)
- *Cox v. City of Jackson*, 811 F. App'x 284, 286 (6th Cir. 2020)

- Rahman v. Stephenson, 626 F. Supp. 886, 887 (W.D. Tenn. 1986)
- Center for Bio-Ethical Reform, Inc. v. Napolitano, 648 F.3d 365, 379 (6th Cir. 2011)
- Club Italia Soccer & Sports Organization, Inc. v. Charter Township of Shelby, Michigan, 470 F.3d 286, 299 (6th Cir. 2006)
- Robinson v. Jackson, 615 F. App'x 310, 314 (6th Cir. 2015)
- City of Cleburne v. Cleburne Living Center, 473 U.S. 432, 439 (1985)
- Paul v. Davis, 424 U.S. 693, 708 (1976)
- Doe v. Michigan Department of State Police, 490 F.3d 491, 501 (6th Cir. 2007)
- Techu-El v. Conetta, No. 22-CV-0111, 2022 WL 2704101, at *3 (S.D.N.Y. July 11, 2022)
- Thomas v. City of Columbus, 854 F.3d 361, 367 (6th Cir. 2017)
- Lee v. Metropolitan Government of Nashville & Davidson County, 432 F. App'x 435, 449 (6th Cir. 2011)
- United Mine Workers of America v. Gibbs, 383 U.S. 715, 726-27 (1966)