

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

Randall Lee Stacel v. Chatham Jail, et al.

Stacel · No. 7:25CV00723 · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of Virginia screened Randall Lee Stacel’s pro se civil rights action under 28 U.S.C. § 1915(e). The court dismissed without prejudice the claims against Chatham Jail and Chatham, Virginia, because they are not persons subject to suit under 42 U.S.C. § 1983, while claims against Sgt. Worley and Officer Johnson remained.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	James P. Jones
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	March 31, 2026
DOCKET	7:25CV00723
DISPOSITION	dismissed
PROCEDURAL POSTURE	A former inmate proceeding pro se filed a civil-rights action under 42 U.S.C. § 1983. During mandatory screening under 28 U.S.C. § 1915(e), the district court sua sponte dismissed the claims against Chatham Jail and Chatham, Virginia, without prejudice for failure to state a claim, while allowing claims against Sgt. Worley and Officer Johnson to remain.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915(e)(2)(B)(ii), including sua sponte dismissal when a complaint fails to state a claim; pro se pleadings are construed liberally.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Randall Lee Stacel v. Chatham Jail, Chatham, Virginia, Sgt. Worley, Officer Johnson

TOPICS

section 1983

prisoners rights

civil rights

motions to dismiss

civil procedure

PRACTICE AREAS

civil rights

prisoner civil rights

federal civil procedure

QUESTIONS PRESENTED

1. Whether the court was required to screen the in forma pauperis complaint under 28 U.S.C. § 1915(e).
2. Whether Chatham Jail and Chatham, Virginia, are persons subject to suit under 42 U.S.C. § 1983.
3. Whether the claims against Chatham Jail and Chatham, Virginia, should be dismissed for failure to state a claim.

HOLDINGS

1. Chatham Jail and Chatham, Virginia, are not persons subject to suit under § 1983 and therefore cannot be defendants on the claims alleged.
2. The claims against Chatham Jail and Chatham, Virginia, were dismissed without prejudice for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii).

KEY QUOTATIONS

“However, even under this less stringent standard, pro se claims are subject to sua sponte dismissal “at any time” if the court determines that the complaint “fails to state a claim on which relief may be granted.””

FACTUAL BACKGROUND

Randall Lee Stacel, a former inmate proceeding pro se, alleged that defendants used excessive force against him while he was incarcerated. He named Chatham Jail and Chatham, Virginia, among the defendants, as well as Sgt. Worley and Officer Johnson. The court dismissed the claims against the jail and municipality-related defendant but left the claims against the individual officers pending.

PROCEDURAL HISTORY

Stacel filed an in forma pauperis § 1983 complaint alleging excessive force during his incarceration. The district court screened the initial filing under 28 U.S.C. § 1915(e) and dismissed the claims against Chatham Jail and Chatham, Virginia, because those entities were not persons subject to suit under § 1983. The action continued against Sgt. Worley and Officer Johnson.

DISPOSITION

dismissed

CASES CITED

- *Eriline Co. S.A. v. Johnson*, 440 F.3d 648, 656 (4th Cir. 2006)

- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Cooper v. Sheehan, 735 F.3d 153, 158 (4th Cir. 2013)
- Will v. Michigan Department of State Police, 491 U.S. 58 (1989)

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