

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Orane M. Cornish Jr. v. Cheyanne Tripp et al.

Cornish v. Tripp · No. 3:24-CV-2019 (SVN) · Decided January 26, 2026

SUMMARY

The United States District Court for the District of Connecticut ruled on motions to dismiss, a motion for leave to amend, and a motion for sanctions in an action brought under the Trafficking Victims Protection Act and Fair Housing Act. The court allowed the plaintiff’s TVPA claims against both defendants to proceed, allowed the FHA claim against defendant Cheyanne Tripp to proceed, dismissed the FHA claim against defendant Jaykuan Paris without leave to amend, and denied the motions for a more definite statement, leave to amend, and sanctions.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Sarala V. Nagala
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	January 26, 2026
DOCKET	3:24-CV-2019 (SVN)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff proceeding pro se brought claims under the Trafficking Victims Protection Act and Fair Housing Act. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6) or, alternatively, for a more definite statement under Rule 12(e). Plaintiff moved for leave to amend to add a claim under 42 U.S.C. § 1985(2) and moved for sanctions.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, draws reasonable inferences in the plaintiff's favor, and determines whether the complaint states a facially plausible claim for relief. Conclusory allegations and legal conclusions are not accepted as factual allegations. Leave to amend may be denied as futile when the proposed claim could not withstand a Rule 12(b)(6) motion. A Rule 12(e) motion is appropriate only when a pleading is so vague or ambiguous that the responding party cannot reasonably prepare a response.

PRECEDENTIAL VALUE	unpublished district court opinion; persuasive only
PARTIES	Orane M. Cornish Jr. v. Cheyanne Tripp, Jaykuan Paris

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the second amended complaint plausibly stated claims under 18 U.S.C. §§ 1589, 1590, and 1591 of the Trafficking Victims Protection Act against both Defendants.
2. Whether the second amended complaint plausibly stated a Fair Housing Act hostile-housing-environment claim against Tripp.
3. Whether the second amended complaint plausibly stated a Fair Housing Act claim against Paris, who was not alleged to be Plaintiff's landlord or to have a landlord-tenant relationship with Plaintiff.
4. Whether Defendants were entitled to a more definite statement under Federal Rule of Civil Procedure 12(e).
5. Whether Plaintiff should be permitted to amend to add a claim under 42 U.S.C. § 1985(2).
6. Whether sanctions should be imposed against Defendants.

HOLDINGS

1. The second amended complaint plausibly alleged that Defendants knowingly obtained Plaintiff's labor through threats of serious harm, including eviction, homelessness, false criminal accusations, and related coercion.
2. The second amended complaint plausibly alleged that Defendants knowingly harbored Plaintiff for labor or services obtained in violation of the forced-labor statutes.
3. The second amended complaint plausibly alleged that Tripp and Paris used force, threats of force, fraud, or coercion to cause Plaintiff to engage in commercial sex acts.
4. The second amended complaint plausibly stated a hostile-housing-environment claim against Tripp under 42 U.S.C. § 3604(b).
5. The FHA claim against Paris was dismissed because the complaint did not sufficiently connect his alleged threats to Plaintiff's housing arrangement and did not allege that Paris was Plaintiff's landlord or had another sufficient housing-related relationship.
6. The Rule 12(e) motions were denied because Defendants identified no particular defects and the second amended complaint satisfied Rule 8's basic pleading requirements.

7. Leave to amend was denied because the proposed § 1985(2) claim was futile and was not plausibly pleaded.
8. The court declined to impose sanctions at that time, notwithstanding Defendants' failures to comply with certain procedural requirements, because of their pro se status and the court's discretionary authority under Rule 16(f).

KEY QUOTATIONS

“For the reasons described below, the Court denies Defendants’ motions to dismiss as to Plaintiff’s TVPA claim; and grants Defendant Paris’s motion to dismiss as to Plaintiff’s FHA claim; and denies Defendant Tripp’s motion to dismiss as to Plaintiff’s FHA claim.” (at 2)

“Thus, the Court denies Defendants’ motions to dismiss on this portion of Plaintiff’s TVPA claim.” (at 10)

“Accordingly, Plaintiff’s FHA claim against Defendant Paris must be dismissed.” (at 15)

“Sanctions could therefore be appropriate under Rule 16(f), for failure to obey a scheduling or other pretrial order.” (at 21)

FACTUAL BACKGROUND

In December 2023, Cheyanne Tripp invited Plaintiff to live at a Bristol, Connecticut property that Plaintiff alleges was represented as habitable but was later deemed uninhabitable. Plaintiff alleges that, while residing there, Defendants coerced him into performing more than \$9,000 in unpaid automobile repairs through threats of eviction, homelessness, false criminal accusations, and physical harm. He also alleges that Tripp conditioned continued housing on submission to unwanted sexual advances and that Paris threatened physical harm and sought to discourage Plaintiff from pursuing legal claims.

PROCEDURAL HISTORY

After an initial review of the complaint allowed some claims to proceed and recommended dismissal of others, Plaintiff filed a second amended complaint. The court resolved Defendants' motions to dismiss, the alternative Rule 12(e) motions, Plaintiff's motion for leave to amend, and Plaintiff's sanctions motion. The court allowed the TVPA claims against both Defendants and the FHA claim against Tripp to proceed, dismissed the FHA claim against Paris without leave to amend, denied leave to add the § 1985(2) claim, denied sanctions, and directed Defendants to answer.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Faber v. Metro. Life Ins. Co., 648 F.3d 98, 104 (2d Cir. 2011)

- Rolon v. Henneman, 517 F.3d 140, 149 (2d Cir. 2008)
- Fowlkes v. Ironworkers Loc. 40, 790 F.3d 378, 387 (2d Cir. 2015)
- Triestman v. Fed. Bureau of Prisons, 470 F.3d 471, 477 (2d Cir. 2006)
- Mangiafico v. Blumenthal, 471 F.3d 391, 398 (2d Cir. 2006)
- Sahebdin v. Khelawan, No. 21-CV-2956 (MKB), 2022 WL 4451005, at *4 (E.D.N.Y. Sept. 24, 2022)
- Martinez v. 189 Christie St. Partners, LP, No. 22-CV-3111 (VEC), 2023 WL 5390442, at *4 (S.D.N.Y. Aug. 22, 2023)
- Adia v. Grandeur Mgmt., Inc., 933 F.3d 89, 93 (2d Cir. 2019)
- Paguirigan v. Prompt Nursing Emp. Agency LLC, 286 F. Supp. 3d 430, 438-39 (E.D.N.Y. 2017)
- Akhtar v. Vitamin Herbal Homeopathic Ctr. Inc., No. 19-CV-1422 (WFK)(RER), 2021 WL 7186030, at *8 (E.D.N.Y. Apr. 30, 2021)
- Noble v. Weinstein, 335 F. Supp. 3d 504, 516 (S.D.N.Y. 2018)
- Texas Dep't of Hous. & Cmty. Affs. v. Inclusive Communities Project, Inc., 576 U.S. 519, 539 (2015)
- Haber v. ASN 50th St. LLC, 847 F. Supp. 2d 578, 584-85 (S.D.N.Y. 2012)
- Smith v. New Neighborhoods, Inc., No. 3:24-CV-327 (KAD), 2025 WL 2615052, at *7 (D. Conn. Sept. 10, 2025)
- Favourite v. 55 Halley St., Inc., 381 F. Supp. 3d 266, 277 (S.D.N.Y. 2019)
- Mohamed v. McLaurin, 390 F. Supp. 3d 520, 548 (D. Vt. 2019)
- Cain v. Rambert, No. 13-CV-5807 (MKB), 2014 WL 2440596, at *4-5 (E.D.N.Y. May 30, 2014)
- Ruotolo v. City of New York, 514 F.3d 184, 191 (2d Cir. 2008)
- Lucente v. Int'l Bus. Machs. Corp., 310 F.3d 243, 258 (2d Cir. 2002)
- Salahuddin v. Cuomo, 861 F.2d 40, 42 (2d Cir. 1988)
- Zemsky v. City of N.Y., 821 F.2d 148, 151 & n.4 (2d Cir. 1987)
- Khan v. City of N.Y., No. 14-CV-4665 (SLT) (VMS), 2016 WL 1128298, at *7 (E.D.N.Y. Feb. 1, 2016)
- ProBatter Sports, LLC v. Sports Tutor, Inc., 246 F.R.D. 99, 101 (D. Conn. 2007)
- Pullen v. Northstar Presidio Mgmt. Co., LLC, No. 3:98-CV-771 (WWE)DW, 1998 WL 696010, at *1 (D. Conn. Sept. 11, 1998)
- Ramey v. Morgan, No. 3:17-CV-01086 (JAM), 2017 WL 5171846, at *2 (D. Conn. Nov. 7, 2017)
- Clayton v. City of Middletown, 237 F.R.D. 538, 539 (D. Conn. 2006)
- Liebowitz v. Bandshell Artist Mgmt., 6 F.4th 267, 290-91 (2d Cir. 2021)