

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Ali Muhammad v. Deputy Jayuan Willis, Deputy Demko, Deputy
Cullen, and Deputy Jesse Morns

Muhammad · No. 9:24-cv-872 (BKS/MJK) · Decided January 7, 2026

SUMMARY

The Northern District of New York adopted a magistrate judge’s Report-Recommendation and granted defendants’ Rule 12(b)(6) motion in Ali Muhammad’s 42 U.S.C. § 1983 action arising from his detention at the Onondaga County Justice Center. The court dismissed the amended complaint for failure to plausibly allege personal involvement by certain defendants or deliberate indifference by another defendant, and directed the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Brenda K. Sannes
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	January 7, 2026
DOCKET	9:24-cv-872 (BKS/MJK)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed an unobjected-to magistrate judge's Report-Recommendation under the clear-error standard and granted Defendants' Rule 12(b)(6) motion to dismiss the amended complaint.
STANDARD OF REVIEW	Clear-error review of an unobjected-to magistrate judge's Report-Recommendation.
PRECEDENTIAL VALUE	unpublished district court memorandum-decision and order
PARTIES	Ali Muhammad v. Deputy Jayuan Willis, Deputy Demko, Deputy Cullen, Deputy Jesse Morns

TOPICS

- motions to dismiss
- prisoners rights
- section 1983
- civil rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should review the magistrate judge's Report-Recommendation for clear error when no party filed objections within the prescribed period.
2. Whether the amended complaint plausibly alleged that Defendants Willis, Demko, and Cullen were personally involved in the alleged constitutional violation.
3. Whether the amended complaint plausibly alleged that Defendant Morns acted with deliberate indifference in violation of the Eighth Amendment.

HOLDINGS

1. When no objections are filed to a magistrate judge's Report-Recommendation and the objection period has expired, the district court reviews the recommendation for clear error.
2. The amended complaint failed to plausibly allege personal involvement by Defendants Willis, Demko, and Cullen in the alleged constitutional violation and failed to plausibly allege that Defendant Morns acted with deliberate indifference; dismissal under Rule 12(b)(6) was therefore warranted.

KEY QUOTATIONS

“As no objections to the Report-Recommendation have been filed, and the time for filing objections has expired, the Court reviews the Report-Recommendation for clear error.”

“The Court finds no clear error in that determination and for that reason adopts the recommendation in the Report-Recommendation.”

FACTUAL BACKGROUND

Muhammad was detained at the Onondaga County Justice Center and asserted an Eighth Amendment conditions-of-confinement claim under 42 U.S.C. § 1983. The court concluded that the amended complaint did not plausibly allege personal involvement by Defendants Willis, Demko, and Cullen, or deliberate indifference by Defendant Morns.

PROCEDURAL HISTORY

Muhammad filed a pro se 42 U.S.C. § 1983 action concerning his detention at the Onondaga County Justice Center. After screening under 28 U.S.C. § 1915A, the court allowed an Eighth Amendment conditions-of-confinement claim to proceed against the named defendants and dismissed other claims without prejudice. Defendants moved to dismiss the amended complaint, and Magistrate Judge Mitchell J. Katz recommended dismissal. No objections were filed, so Chief Judge Sannes reviewed the recommendation for clear error, adopted it, granted the motion, dismissed the amended complaint, and directed the Clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Petersen v. Astrue, 2 F. Supp. 3d 223, 228-29 (N.D.N.Y. 2012)

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