

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

Anthony Farmer v. Johnson, et al.

Farmer · No. 7:25-cv-00189 · Decided May 15, 2026

SUMMARY

The United States District Court for the Western District of Virginia dismissed Anthony Farmer’s pro se 42 U.S.C. § 1983 complaint without prejudice under 28 U.S.C. § 1915A(b)(1). Farmer alleged that jail officials failed to warn inmates about a wet floor, causing him to slip and fall, and that a sheriff failed to properly train deputies. The court held that the allegations amounted to negligence rather than deliberate indifference under the Eighth or Fourteenth Amendment and declined supplemental jurisdiction over any state-law negligence claim.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Michael F. Urbanski
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	May 15, 2026
DOCKET	7:25-cv-00189
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983 reviewed sua sponte under 28 U.S.C. § 1915A(a).
STANDARD OF REVIEW	The court reviewed the prisoner complaint under 28 U.S.C. § 1915A and applied the Rule 12(b)(6)-type plausibility standard, accepting well-pleaded factual allegations as true and construing the pro se complaint liberally.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Anthony Farmer v. Johnson, Vambak, Holmes, Antonio Hash, Other officials at the Roanoke City Adult Detention Center

TOPICS

section 1983

prisoners rights

civil rights

motions to dismiss

due process

PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged deliberate indifference to inmate health or safety under the Eighth Amendment or the Fourteenth Amendment.
2. Whether allegations that jail officials failed to warn inmates about a wet floor stated an actionable claim under 42 U.S.C. § 1983 rather than merely negligence.
3. Whether Sheriff Hash could be held liable under § 1983 based solely on his supervisory position when the complaint alleged no underlying constitutional violation.

HOLDINGS

1. The complaint failed to state a plausible deliberate-indifference claim because the alleged wet-floor condition and failure to warn, without more, amounted to negligence rather than a constitutional violation.
2. Sheriff Hash could not be held liable under § 1983 based solely on his supervisory position because the complaint failed to allege an underlying constitutional violation.

KEY QUOTATIONS

“To survive dismissal for failure to state a claim, “a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’” (at 2)

“This is a “very high standard,” which is not met by a showing of mere negligence.” (at 5)

“As other courts have recognized, a claim based on the alleged failure to warn about a wet floor is “a garden-variety negligence claim,” which is “not actionable under section 1983.”” (at 5)

FACTUAL BACKGROUND

During an evening headcount on February 7, 2025, officers discovered a flood in the detention-center pod that required cleaning supplies. Officers later released Farmer and other inmates for recreation, and Farmer slipped and fell when he exited his cell; paramedics transported him to a hospital. Farmer alleged that no wet-floor signs were placed in the pod and that Sheriff Antonio Hash failed to properly train jail deputies.

PROCEDURAL HISTORY

Anthony Farmer, an inmate proceeding pro se, filed a § 1983 complaint against officials at the Roanoke City Adult Detention Center based on a slip-and-fall incident. The district court screened the complaint under 28 U.S.C. § 1915A and dismissed it without prejudice for failure to state a claim under § 1915A(b)(1). The court declined to exercise supplemental jurisdiction over any intended state-law negligence claim.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- King v. Rubenstein, 825 F.3d 206, 214 (4th Cir. 2016)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1278 (4th Cir. 1985)
- Jackson v. Dameron, 171 F.4th 641, 650 (4th Cir. 2026)
- Thomas v. Salvation Army S. Terr., 841 F.3d 632, 637 (4th Cir. 2016)
- Safar v. Tingle, 859 F.3d 241, 245 (4th Cir. 2017)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Farmer v. Brennan, 511 U.S. 825, 832, 834 (1994)
- Porter v. Clarke, 923 F.3d 348, 355 (4th Cir. 2019)
- Danser v. Stansberry, 772 F.3d 340, 347 (4th Cir. 2014)
- Ford v. Hooks, 108 F.4th 224, 230 (4th Cir. 2024)
- Hammock v. Watts, 146 F.4th 349, 360 (4th Cir. 2025)
- Kingsley v. Hendrickson, 576 U.S. 389, 398 (2015)
- Shakka v. Smith, 71 F.3d 162, 166 (4th Cir. 1995)
- Short v. Hartman, 87 F.4th 593, 608-10, 612 (4th Cir. 2023)
- Daniels v. Williams, 474 U.S. 327, 333 (1986)
- Marsh v. Jones, 53 F.3d 707, 712 (5th Cir. 1995)
- Balle v. Kennedy, 73 F.4th 545, 554 (7th Cir. 2023)
- Pyles v. Fahim, 771 F.3d 403, 410 (7th Cir. 2014)
- Bacon v. Carroll, 232 F. App'x 158, 159 (3d Cir. 2007)
- Snyder v. Blankenship, 473 F. Supp. 1208, 1213 (W.D. Va. 1979)
- Phillips v. Bailey, 337 F. Supp. 2d 804, 807 (W.D. Va. 2004)