

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Mary Ames, et al. v. Trina Sexton, et al.

No reporter citation; No. 3:24-CV-00929 (VDO) (D. Conn. Mar. 30, 2026) · No. 3:24-CV-00929 (VDO) ·
Decided March 30, 2026

SUMMARY

The document is a memorandum and order addressing defendants’ motion for summary judgment in a case brought by incarcerated plaintiffs who practice the Native American religion. The claims concern alleged interference with smudging and the handling of sacred medicine bags, including claims under RLUIPA, the First Amendment, and the Fourteenth Amendment. The court grants the motion in part and denies it in part, dismissing claims that were unexhausted and claims against certain supervisory defendants.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Vernon D. Oliver
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	March 30, 2026
DOCKET	3:24-CV-00929 (VDO)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff inmates brought claims under RLUIPA and 42 U.S.C. § 1983 alleging violations of the First Amendment Free Exercise and Establishment Clauses and the Fourteenth Amendment Equal Protection Clause. After initial review permitted the action to proceed in part, defendants moved for summary judgment.
STANDARD OF REVIEW	Summary judgment is appropriate when the record shows no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. The court viewed facts, resolved ambiguities, and drew permissible inferences in favor of the nonmoving party. Exhaustion was evaluated under the PLRA's proper-exhaustion requirement, and the merits were assessed under the applicable First Amendment and RLUIPA standards.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive authority only

PARTIES

Mary Ames, Brianna Triplett v. Trina Sexton, Michael Beaton, Hunter, Adetola, Burgos, Brooks, Cabrera, Duntz, Lebron, Neel, Myers, Kamal, Santini, Mercado, Whitlock

TOPICS

prisoners rights

free exercise clause

section 1983

qualified immunity

summary judgment

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

religious freedom

civil procedure

QUESTIONS PRESENTED

1. Whether plaintiffs exhausted their administrative remedies under the PLRA for the religious-practice claims asserted in the complaint.
2. Whether genuine disputes of material fact precluded summary judgment on plaintiffs' First Amendment Free Exercise claims concerning the handling of medicine bags and denial of smudging.
3. Whether genuine disputes of material fact precluded summary judgment on plaintiffs' RLUIPA claims concerning denial of smudging.
4. Whether defendants were entitled to qualified immunity on the Free Exercise and RLUIPA claims.
5. Whether claims against the warden and deputy warden could proceed when those defendants were alleged to be liable only because of their supervisory roles.
6. Whether plaintiffs' Establishment Clause and Equal Protection claims were exhausted.

HOLDINGS

1. Claims that plaintiffs did not properly exhaust through the prison's required grievance process must be dismissed. Informal complaints, a personal smudging log, or merely initiating but procedurally failing to complete a grievance do not satisfy the PLRA's proper-exhaustion requirement.
2. Summary judgment was denied on the exhausted Free Exercise claims concerning the September 13, 2021, search of Ames's medicine bag and the November 21, 2023, and January 11, 2024, searches of Triplett's medicine bag.
3. Summary judgment was denied on the exhausted Free Exercise claims concerning the general smudging policy, the COVID-19 smudging policy, and the December 22, 2023, and January 6, 2024, denials of smudging.
4. Summary judgment was denied on plaintiffs' RLUIPA claims concerning improper denials of smudging, while other RLUIPA claims were dismissed because plaintiffs sought no available prospective remedy for them.
5. Qualified immunity could not be resolved in defendants' favor at summary judgment on the remaining medicine-bag and smudging claims because factual disputes remained concerning both constitutional violations and the existence of penological justification or a clearly established right.

6. All claims against Warden Sexton and Deputy Warden Beaton were dismissed because plaintiffs alleged liability against them only in their supervisory capacities and did not plead direct participation in the underlying violations.

KEY QUOTATIONS

“Exhaustion is mandatory—unexhausted claims may not be pursued in federal court.” (Section III.A)

“This Court will not begin an inquiry as to whether smudging was a central tenant of Plaintiffs’ religious practice, and it will adhere to the Second Circuit’s mandate that such questions are beyond the purview of federal courts.” (Section III.B.1.b)

“The Second Circuit found, based on its own precedent from 1993, that the inmate in Baltas had a well established “constitutional right to participate in congregate religious services,” and that right was violated when prison officials denied him the opportunity to smudge with other inmates, instead requiring him to “dry smudge” in his cell.” (Section III.C.2)

“For the foregoing reasons, the Court DENIES summary judgment as to Plaintiffs’ Free Exercise and RLUIPA claims concerning” (Conclusion)

FACTUAL BACKGROUND

Plaintiffs Mary Ames and Brianna Triplett are inmates at York Correctional Institution who practice the Native American religion through smudging and use of sacred medicine bags. They alleged that staff repeatedly denied opportunities to smudge and, during shakedowns, dumped or scattered the contents of their medicine bags despite prison policies governing religious articles. Plaintiffs filed grievances concerning several incidents and broader smudging policies, but did not properly grieve every allegation asserted in the complaint. The record also showed that prison officials sometimes changed or sought to change policies and reminded staff about handling religious items in response to grievances.

PROCEDURAL HISTORY

Plaintiffs alleged that personnel at York Correctional Institution denied opportunities to smudge and mishandled Native American medicine bags, and that prison policies favored other religions. On defendants' motion for summary judgment, the court dismissed all unexhausted claims, the Establishment Clause and Equal Protection claims, several Free Exercise and RLUIPA claims, and all claims against supervisory defendants Sexton and Beaton. The court denied summary judgment on specified exhausted Free Exercise and RLUIPA claims involving medicine-bag searches and smudging restrictions because genuine disputes of material fact remained.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)

- Wilson v. Northwestern Mutual Insurance Co., 625 F.3d 54, 60 (2d Cir. 2010)
- Zalaski v. City of Bridgeport Police Department, 613 F.3d 336, 340 (2d Cir. 2010)
- Dallas Aerospace, Inc. v. CIS Air Corp., 352 F.3d 775, 780 (2d Cir. 2003)
- Security Insurance Co. of Hartford v. Old Dominion Freight Line, Inc., 391 F.3d 77, 83 (2d Cir. 2004)
- Brown v. Eli Lilly & Co., 654 F.3d 347, 358 (2d Cir. 2011)
- Dawson v. County of Westchester, 373 F.3d 265, 272 (2d Cir. 2004)
- Perttu v. Richards, 605 U.S. 460, 469 (2025)
- Porter v. Nussle, 534 U.S. 516, 532 (2002)
- Amador v. Andrews, 655 F.3d 89, 96 (2d Cir. 2011)
- Macias v. Zenk, 495 F.3d 37, 44 (2d Cir. 2007)
- Day v. Chaplin, 354 F. App'x 472, 474 (2d Cir. 2009)
- Ross v. Blake, 578 U.S. 632, 642–44 (2016)
- Romano v. Ulrich, 49 F.4th 148, 155 (2d Cir. 2022)
- Riles v. Buchanan, 656 F. App'x 577, 579 (2d Cir. 2016)
- Woodford v. Ngo, 548 U.S. 81, 83 (2006)
- Cannady v. Board of Trustees of Boilermaker-Blacksmith National Pension Trust, 2020 WL 4748055, at *6 n.7 (N.D.N.Y. Aug. 17, 2020), aff'd, 2022 WL 151298 (2d Cir. Jan. 18, 2022)
- Kravitz v. Purcell, 87 F.4th 111, 119, 128–29 (2d Cir. 2023)
- Farid v. Smith, 850 F.2d 917, 926 (2d Cir. 1988)
- Braun v. Sterno, 2018 WL 5778248, at *4–5 (D. Conn. Nov. 2, 2018)
- Baltas v. Chapdelaine, 153 F.4th 328, 335, 340–41 (2d Cir. 2025)
- O'Lone v. Estate of Shabazz, 482 U.S. 342, 348–49 (1987)
- Williams v. Annucci, 895 F.3d 180, 188 (2d Cir. 2018)
- Redd v. Wright, 597 F.3d 532, 536 (2d Cir. 2010)
- Holland v. Goord, 758 F.3d 215, 224 (2d Cir. 2014)
- Washington v. Gonyea, 731 F.3d 143, 145 (2d Cir. 2013)
- Sossaman v. Texas, 563 U.S. 277, 293 (2011)
- Ashcroft v. al-Kidd, 563 U.S. 731, 735 (2011)
- Scott v. Fischer, 616 F.3d 100, 105 (2d Cir. 2010)
- Ford v. McGinnis, 352 F.3d 582, 597 (2d Cir. 2003)
- Hudson v. Palmer, 468 U.S. 517, 547 n.13 (1984)
- Gawlik v. Quiros, 2024 WL 4819249, at *8 (D. Conn. Nov. 18, 2024)
- Morse v. Annucci, 2015 WL 5725046, at *7 (N.D.N.Y. Sept. 29, 2015)
- Malik v. City of New York, 2012 WL 3345317, at *12 (S.D.N.Y. Aug. 15, 2012), R&R adopted, 2012 WL 4475156 (S.D.N.Y. Sept. 28, 2012)
- Salahuddin v. Coughlin, 993 F.2d 306 (2d Cir. 1993)
- Tangreti v. Bachmann, 983 F.3d 609, 620 (2d Cir. 2020)

- Mitchell v. Martin, 2023 WL 8114344, at *7 (D. Conn. Nov. 22, 2023)
- Clark v. Valletta, 157 F.4th 201, 209 (2d Cir. 2025)
- Pearson v. Callahan, 555 U.S. 223, 231 (2009)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-district-of-connecticut/2026/mary-ames-et-al-v-trina-sexton-et-al-5i7ipzi0>