

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, CENTRAL DIVISION

Lauri Williams v. United States of America

Williams v. United States · No. 4:24-cv-00692-JM · Decided March 12, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas granted the United States’ second motion to dismiss Lauri Williams’s Federal Tort Claims Act action for lack of subject matter jurisdiction. The court held that claims arising from the VA’s denial of community-care benefits under the Mission Act were barred by the Veterans’ Judicial Review Act, and that Arkansas does not recognize negligent infliction of emotional distress. The court directed that a separate judgment be entered.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	March 12, 2026
DOCKET	4:24-cv-00692-JM
DISPOSITION	dismissed
PROCEDURAL POSTURE	The United States moved under Federal Rule of Civil Procedure 12(b)(1) to dismiss Williams's second amended complaint for lack of subject matter jurisdiction. The court granted the government's second motion to dismiss.
STANDARD OF REVIEW	For a facial Rule 12(b)(1) challenge, the court applied the same standard as under Rule 12(b)(6): accepting the allegations as true and drawing all reasonable inferences in the plaintiff's favor, the complaint must state a facially plausible claim. The party invoking federal jurisdiction bears the burden of establishing it by a preponderance of the evidence.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Lauri Williams v. United States of America

TOPICS

subject matter jurisdiction

motions to dismiss

veterans benefits

medical malpractice

civil procedure

PRACTICE AREAS

civil procedure

subject matter jurisdiction

veterans benefits

Federal Tort Claims Act

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QUESTIONS PRESENTED

1. Whether the Veterans' Judicial Review Act deprived the district court of subject matter jurisdiction over Williams's claims arising from the VA's denial of Mission Act community-care benefits and related administrative conduct.
2. Whether the FTCA's waiver of sovereign immunity permitted Williams to assert a claim for negligent infliction of emotional distress under Arkansas law.
3. Whether the allegations described a negligent medical decision or treatment actionable under the FTCA rather than a benefits dispute subject to the Veterans' Judicial Review Act.

HOLDINGS

1. The Veterans' Judicial Review Act bars district-court review of claims that arise under a law affecting the provision of veterans' benefits. Williams's medical-negligence and negligent-administrative-practices claims were based on the VA's denial of Mission Act community-care benefits, related authorization decisions, and associated administrative conduct, so the district court lacked subject matter jurisdiction over them.
2. The negligent infliction of emotional distress claim was barred because Arkansas does not recognize that tort, and the FTCA waives sovereign immunity only for conduct for which the United States would be liable under the law of the place where the act or omission occurred.

KEY QUOTATIONS

“the district court does not have jurisdiction over a benefits claim once the Secretary decides under a law affecting benefits.” (at 3)

“Courts have wrestled with the issue of when a claim can properly be brought under the FTCA or is precluded by the VJRA.” (at 3)

“Both counts stem from the Secretary’s decision to deny Plaintiff benefits pursuant to the Mission Act.” (at 4)

“Arkansas does not recognize the tort of negligent infliction of emotional distress.” (at 5)

FACTUAL BACKGROUND

Williams, a Navy veteran, was diagnosed with invasive squamous cell carcinoma in March 2022 and underwent surgery and radiation treatment through private providers. She alleged that the VA failed to timely approve follow-up care and denied authorization for urgent community care at CARTI under the Mission Act, while also

failing to provide treatment when she presented at a VA facility. She later underwent additional surgery, filed an administrative tort claim concerning alleged abandonment and related conduct, and brought this FTCA action after the claim was denied.

PROCEDURAL HISTORY

Williams sued the United States under the Federal Tort Claims Act, asserting medical negligence, negligent infliction of emotional distress, and negligent administrative practices and violations of federal law. After Williams filed a second amended complaint, the United States filed a second motion to dismiss, which was fully briefed. The district court dismissed the claims for lack of subject matter jurisdiction and directed that a separate judgment be entered.

DISPOSITION

dismissed

CASES CITED

- Jones v. United States, 727 F.3d 844, 846 (8th Cir. 2013)
- Cook v. George's, Inc., 952 F.3d 935, 938 (8th Cir. 2020)
- Moss v. United States, 895 F.3d 1091, 1097 (8th Cir. 2018)
- Jones v. United States, 727 F.3d 844, 847 (8th Cir. 2013)
- Mehrkens v. Blank, 556 F.3d 865, 869 (8th Cir. 2009)
- Hutchinson v. United States, 71 F.4th 1115, 1117 (8th Cir. 2023)
- FDIC v. Meyer, 510 U.S. 471, 475 (1994)
- Roberson v. United States, No. 23-2583, 2024 WL 2104498, at *2 (3d Cir. May 10, 2024)
- Tunac v. United States, 897 F.3d 1197, 1205 (9th Cir. 2018)
- Smith v. United States, 7 F.4th 963, 978-984, 986 (11th Cir. 2021)
- Thomas v. Principi, 394 F.3d 970, 974-975 (D.C. Cir. 2005)
- Dowty v. Riggs, 2010 Ark. 465, 6, 385 S.W.3d 117, 120 (2010)