

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

Roy Laron Young v. Pulaski County Jail

Young · No. 4:25CV01064-BSM-JTK · Decided December 16, 2025

SUMMARY

Proposed Findings and Recommendations in a prisoner civil rights action under 42 U.S.C. § 1983 in the Eastern District of Arkansas. The magistrate judge recommends dismissal without prejudice because the Pulaski County Detention Center is not a suable person under § 1983 and the amended pleadings identify no individual wrongdoing. The recommendation also addresses potential treatment as a strike under 28 U.S.C. § 1915(g) and certification regarding an in forma pauperis appeal.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
WRITING FOR THE COURT	Jerome T. Kearney
DECIDED	December 16, 2025
DOCKET	4:25CV01064-BSM-JTK
DISPOSITION	dismissed
PROCEDURAL POSTURE	Proposed findings and recommendations following screening of a prisoner civil-rights complaint and amended complaint under the Prison Litigation Reform Act.
STANDARD OF REVIEW	Screening review under the Prison Litigation Reform Act; dismissal recommended for failure to state a claim upon which relief may be granted.
PRECEDENTIAL VALUE	Nonprecedential proposed findings and recommendations
PARTIES	Roy Laron Young v. Pulaski County Jail

TOPICS

- section 1983
- prisoners rights
- pleadings
- civil procedure

PRACTICE AREAS

- prisoner civil rights
- 42 U.S.C. § 1983
- federal civil procedure
- in forma pauperis proceedings

QUESTIONS PRESENTED

1. Whether the Pulaski County Detention Center is a suable person under 42 U.S.C. § 1983.
2. Whether Young's amended complaint stated a § 1983 claim when it identified no individual defendant and alleged no conduct violating his constitutional rights.
3. Whether dismissal should be without prejudice and treated as a strike under 28 U.S.C. § 1915(g).

HOLDINGS

1. The Detention Center is not a legal entity or person subject to suit under 42 U.S.C. § 1983.
2. The amended complaint failed to state a claim because it named only the nonsuable Detention Center and alleged no action by any individual that violated Young's rights.
3. The court recommended that the dismissal count as a strike under 28 U.S.C. § 1915(g), while recognizing that the effective determination of accumulated strikes is made by a later tribunal.

KEY QUOTATIONS

“The Detention Center is not subject to suit under 42 U.S.C. § 1983.”

“In no event shall a prisoner bring a civil action or appeal a judgment in a civil action or proceeding under this section if the prisoner has, on 3 or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.”

FACTUAL BACKGROUND

Young was incarcerated at the Pulaski County Detention Center when he fell from a top rack in the Q Unit and broke his jaw. He filed a § 1983 complaint naming the Detention Center, but alleged no wrongdoing by any identified individual. After being given an opportunity to amend, he again named only the Detention Center and did not identify any person who violated his rights.

PROCEDURAL HISTORY

Young filed a complaint under 42 U.S.C. § 1983 against the Pulaski County Jail and was granted leave to proceed in forma pauperis. After screening, the court advised that the jail was not a person subject to suit under § 1983 and that the complaint alleged no conduct by a specific individual. Young amended his complaint but again named only the Detention Center and alleged only that he fell from a top rack and broke his jaw. The magistrate judge recommended dismissal without prejudice, recommended that the dismissal count as a strike, and recommended certification that an appeal from an adopting order would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Owens v. Scott Cnty. Jail, 328 F.3d 1026, 1027 (8th Cir. 2003)
- LaDeaux v. Woodbury Cnty. Jail, 857 F. App'x 892, 893 (8th Cir. 2021)
- Gonzalez v. United States, 23 F.4th 788, 789-91 (8th Cir. 2022)

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