

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Jack Campbell v. Kootenai County Jail

Campbell · No. 1:25-cv-00536-AKB · Decided December 10, 2025

SUMMARY

The United States District Court for the District of Idaho screened Jack Campbell’s prisoner civil rights complaint against the Kootenai County Jail. The court permitted Campbell to proceed on an Americans with Disabilities Act claim concerning the alleged lack of a handicap-accessible shower, while dismissing his other ADA, due process, and free exercise claims. The court also denied Campbell’s motion for appointment of counsel and issued service and case-management instructions.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Amanda K. Brailsford
JURISDICTION	United States District Court for the District of Idaho
DECIDED	December 10, 2025
DOCKET	1:25-cv-00536-AKB
DISPOSITION	other
PROCEDURAL POSTURE	Initial screening of an incarcerated plaintiff's conditionally filed complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), together with consideration of the plaintiff's motion for appointment of counsel.
STANDARD OF REVIEW	On screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), the court accepts factual allegations as true, liberally construes a pro se complaint, and dismisses claims that are frivolous, malicious, fail to state a plausible claim, or seek relief from an immune defendant. The plausibility standard requires sufficient factual matter to permit a reasonable inference that the defendant is liable.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Jack Campbell v. Kootenai County Jail

TOPICS

- ada / disability
- section 1983
- first amendment
- due process
- motions to dismiss

PRACTICE AREAS

civil procedure

civil rights

disability discrimination

prisoner litigation

constitutional law

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated an ADA Title II claim based on the alleged failure to provide safe access to a handicap-accessible shower.
2. Whether the complaint plausibly stated ADA claims based on Campbell's placement in the medical pod and inability to attend religious or recovery programs.
3. Whether the complaint plausibly stated a 42 U.S.C. § 1983 due process claim based on placement in the medical pod or administrative segregation.
4. Whether the complaint plausibly stated a First Amendment Free Exercise Clause claim based on the denial of access to church and Bible study.
5. Whether exceptional circumstances warranted appointment of counsel in the civil case.

HOLDINGS

1. The complaint plausibly stated a colorable ADA claim that Campbell was denied adequate shower facilities because of his disability, and he could proceed on that claim.
2. The complaint did not plausibly state ADA claims based on Campbell's placement in the medical pod or his resulting lack of access to religious and recovery programs.
3. The complaint did not plausibly state a § 1983 due process claim based on placement in the medical pod or administrative segregation.
4. The complaint did not plausibly state a First Amendment Free Exercise claim based on Campbell's inability to attend church or Bible study.
5. Appointment of counsel was denied because exceptional circumstances were not shown.

KEY QUOTATIONS

“But an inmate cannot be categorically excluded from a beneficial prison program based on his or her disability alone.” (Section 3.A)

“So long as a restriction on an inmate’s religious practice “is reasonably related to legitimate penological interests,” that restriction is valid.” (Section 3.B.ii)

FACTUAL BACKGROUND

Campbell, an incarcerated person with physical and mental illnesses, was held in the Kootenai County Jail's medical pod beginning May 15, 2024. During approximately the following month, he received only two showers, and the medical pod lacked a handicap-accessible shower; although an accessible shower existed in a neighboring housing unit, staff did not permit him to use it. Campbell also alleged that he could not attend religious services and recovery programs because jail staff cited insufficient staffing, and he inconsistently described his housing as both the medical pod and administrative segregation.

PROCEDURAL HISTORY

The Clerk conditionally filed Campbell's complaint because he was an inmate proceeding in forma pauperis. The court screened the complaint, permitted him to proceed on an ADA claim concerning the lack of a handicap-accessible shower, dismissed all other claims without prejudice to a possible motion to amend, and denied appointment of counsel.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79, 682 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Jackson v. Arizona, 885 F.2d 639, 640 (9th Cir. 1989)
- Lopez v. Smith, 203 F.3d 1122, 1130 (9th Cir. 2000)
- Weinreich v. Los Angeles County Metropolitan Transportation Authority, 114 F.3d 976, 978 (9th Cir. 1997)
- United States v. Georgia, 546 U.S. 151, 159 (2006)
- Vinson v. Thomas, 288 F.3d 1145, 1156 (9th Cir. 2002)
- Pierce v. County of Orange, 526 F.3d 1190, 1221 (9th Cir. 2008)
- Crumpton v. Gates, 947 F.2d 1418, 1420 (9th Cir. 1991)
- Johnson v. Duffy, 588 F.2d 740, 743 (9th Cir. 1978)
- Monell v. Department of Social Services of the City of New York, 436 U.S. 658, 691, 694 (1978)
- Mabe v. San Bernardino County, 237 F.3d 1101, 1110-11 (9th Cir. 2001)
- Clouthier v. County of Contra Costa, 591 F.3d 1232, 1250 (9th Cir. 2010)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1069 (9th Cir. 2016) (en banc)
- Adickes v. S.H. Kress & Co., 398 U.S. 144, 167-68 (1970)
- Trevino v. Gates, 99 F.3d 911, 918 (9th Cir. 1996)
- Eclectic Properties East, LLC v. Marcus & Millichap Co., 751 F.3d 990, 999 n.8 (9th Cir. 2014)
- Cantwell v. Connecticut, 310 U.S. 296, 303-04 (1940)
- O'Lone v. Estate of Shabazz, 482 U.S. 342, 348, 350-53 (1987)
- Cruz v. Beto, 405 U.S. 319, 322 & n.2 (1972) (per curiam)
- Shakur v. Schriro, 514 F.3d 878, 884 (9th Cir. 2008)
- Malik v. Brown, 16 F.3d 330, 333 (9th Cir. 1994)
- Hernandez v. Commissioner, 490 U.S. 680, 699 (1989)
- Rapier v. Harris, 172 F.3d 999, 1006 n.4 (7th Cir. 1999)
- Jones v. North Carolina Prisoners' Union, 433 U.S. 119, 125 (1977)
- Wintrode v. Ada County Jail Employees, No. 1:24-CV-00015-DCN, 2025 WL 2374328, at *3 (D. Idaho Aug. 13, 2025)

- Tapp v. Stanley, 2008 WL 4934592, at *7 (W.D.N.Y. Nov. 17, 2008)
- Lassiter v. Department of Social Services, 452 U.S. 18, 25 (1981)
- Wilborn v. Escalderon, 789 F.2d 1328, 1331 (9th Cir. 1986)
- Terrell v. Brewer, 935 F.2d 1015, 1017 (9th Cir. 1991)
- Mallard v. United States District Court for the Southern District of Iowa, 490 U.S. 296, 298 (1989)
- Veenstra v. Idaho State Board of Corrections, Case No. 1:15-cv-00270-EJL (D. Idaho May 4, 2017)
- Forsyth v. Humana, Inc., 114 F.3d 1467, 1474 (9th Cir. 1997)
- Lacey v. Maricopa County, 693 F.3d 896 (9th Cir. 2012) (en banc)
- Hal Roach Studios, Inc. v. Richard Feiner & Co., 896 F.2d 1542, 1546 (9th Cir. 1990)

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