

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Jeremy Spencer v. Ryan Cain, et al.

Spencer v. Cain · No. 2:25-cv-781 · Decided December 1, 2025

SUMMARY

The United States District Court for the Southern District of Ohio overruled Jeremy Spencer’s objections to a magistrate judge’s screening recommendation and dismissed his federal claims under 42 U.S.C. § 1983 for failure to state a claim. The court declined supplemental jurisdiction over the state-law claims and denied leave to amend as futile.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	James L. Graham; Chelsey M. Vascura
JURISDICTION	United States District Court for the Southern District of Ohio
DECIDED	December 1, 2025
DOCKET	2:25-cv-781
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected under 28 U.S.C. § 636(b)(1)(C) to a magistrate judge's report and recommendation recommending dismissal of his in forma pauperis complaint at the initial-screening stage. Plaintiff also sought leave to file a proposed amended complaint.
STANDARD OF REVIEW	The district court reviewed de novo the portions of the report and recommendation to which plaintiff objected under 28 U.S.C. § 636(b)(1)(C). For the pleading screen, the court applied the Rule 12(b)(6)-type plausibility standard described in Ashcroft v. Iqbal, accepting properly pleaded factual allegations as true but rejecting conclusory allegations.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reporter citation or stated precedential designation.

PARTIES

Jeremy Spencer v. Ryan Cain, Jimmy Ward, Stephany Webb, Heather Dorsey, Jerry Luis, Stormy Ball, Becky Easterling, Southeastern Ohio Regional Jail, Josh Vanbibber, Jeremy Tolson

TOPICS

section 1983 civil rights motions to dismiss due process civil procedure

PRACTICE AREAS

civil rights constitutional law prisoner civil rights federal civil procedure supplemental jurisdiction

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible federal claim under 42 U.S.C. § 1983 against the Southeastern Ohio Regional Jail, the county-related defendants, supervisory officials, and individual jail employees.
2. Whether the alleged uses of force during intake and removal from a cell were objectively unreasonable under the Fourteenth Amendment.
3. Whether the alleged denial of medical care, bedding, hygiene supplies, warm clothing, and sanitary conditions stated constitutional claims.
4. Whether the alleged failure to provide written charges during an initial appearance violated due process or the Sixth Amendment.
5. Whether compelled fingerprinting during the booking process violated the Fourth Amendment.
6. Whether plaintiff should be granted leave to amend under Federal Rule of Civil Procedure 15.
7. Whether the court should exercise supplemental jurisdiction over the state-law claims.

HOLDINGS

1. The complaint failed to state a claim against the Southeastern Ohio Regional Jail because the county agency was not sui juris and was not capable of being sued.
2. The complaint failed to state a municipal-liability claim because it did not allege that a municipal custom or policy caused the asserted constitutional violations.
3. The complaint failed to state claims against the warden, deputy warden, and sheriff because it alleged no personal participation and impermissibly relied on respondeat superior.
4. The complaint did not plausibly allege that Ward's or Webb's use of force was objectively unreasonable.
5. The complaint failed to state claims concerning hypothermia, denial of bedding and hygiene supplies, unsanitary conditions, medical care, or retaliation because it did not attribute the alleged misconduct to the defendants in their individual capacities or to a municipal policy or custom.
6. The alleged failure by jail employee Ball to provide written charges did not state a constitutional claim because the Constitution required fair and adequate notice from the State, not necessarily written notice

from a jail employee, and Spencer alleged that the state court judge provided notice during the initial appearance.

7. The complaint did not state a Fourth Amendment claim based on the taking of Spencer's fingerprints because his arrest and felony weapons charge supplied sufficient grounds for fingerprinting during the booking process.
8. Section 1983 was not the proper avenue for Spencer to collaterally attack his state-court sentence or conviction.
9. Leave to amend was denied because the proposed amended complaint was futile and still failed to state a claim.
10. The court declined to exercise supplemental jurisdiction over the remaining state-law claims after dismissing the federal claims.

KEY QUOTATIONS

“While it is true that the Complaint alleges that Ward and Webb used force, plaintiff ignores that the Complaint fails to contain factual allegations supporting an inference that the uses of force were unreasonable.” (Part II.A)

“The Court thus denies plaintiff leave to amend the Complaint.” (Part II.B)

“For the reasons stated above, plaintiff’s objections (Doc. 6) are overruled, the Report and Recommendation (Doc. 5) is adopted in its entirety, and plaintiff’s federal claims are dismissed.” (Part III)

FACTUAL BACKGROUND

Spencer was detained at the Southeastern Ohio Regional Jail from May 1 through May 10, 2024, after an arrest for failure to appear on a traffic citation and an alleged felony weapons charge. He alleged that jail staff used force during intake, failed to provide adequate medical care and necessities, placed him in unsanitary conditions, retaliated against him, failed to provide written charging paperwork during a videoconference initial appearance, and compelled fingerprinting. He also alleged that a jail employee inadequately responded to a later Ohio public-records request.

PROCEDURAL HISTORY

Spencer filed a pro se action asserting federal civil-rights claims under 42 U.S.C. § 1983 and related claims under §§ 1985 and 1986, along with Ohio-law claims, arising from his detention at the Southeastern Ohio Regional Jail. The magistrate judge screened the complaint under 28 U.S.C. § 1915(e)(2) and recommended dismissal of the federal claims for failure to state a claim and declining supplemental jurisdiction over the state-law claims. The district court conducted de novo review of the objections, adopted the recommendation, dismissed the federal claims, declined supplemental jurisdiction over the state-law claims, denied leave to amend as futile, and directed entry of judgment for defendants.

DISPOSITION

dismissed

CASES CITED

- Carmichael v. City of Cleveland, 571 Fed. App'x 426, 435 (6th Cir. 2014)
- Monell v. Department of Social Services, 436 U.S. 658, 694 (1978)
- Grinter v. Knight, 532 F.3d 567, 575 (6th Cir. 2008)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Heck v. Humphrey, 512 U.S. 477, 486 (1994)
- Kingsley v. Hendrickson, 576 U.S. 389, 396–97 (2015)
- Koontz v. Glosa, 731 F.2d 365, 369 (6th Cir. 1984)
- Hayes v. Florida, 470 U.S. 811, 815, 817 (1985)
- Clark v. Oakland County, No. 08-14824, 2009 WL 5217682, at *4 (E.D. Mich. Dec. 29, 2009)
- Brooks v. Rothe, 577 F.3d 701, 709 (6th Cir. 2009)
- Robinson v. Michigan Consolidated Gas Co., 918 F.2d 579, 591 (6th Cir. 1990)