

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Thomas Jeff Henry v. S.W.V.R.J. — Duffield

Henry · No. 7:25-cv-00341 · Decided April 21, 2026

SUMMARY

The United States District Court for the Western District of Virginia dismisses Thomas Jeff Henry’s 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A for failure to state a claim. The court concludes that the named jail is not a person subject to suit under § 1983 and that the complaint contains only conclusory allegations without factual details regarding the alleged unlawful arrest or civil-rights violations.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Robert S. Ballou
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	April 21, 2026
DOCKET	7:25-cv-00341
DISPOSITION	dismissed
PROCEDURAL POSTURE	A Virginia prisoner proceeding pro se filed a 42 U.S.C. § 1983 complaint. Upon preliminary screening under 28 U.S.C. § 1915A, the district court dismissed the complaint for failure to state a claim upon which relief may be granted.
STANDARD OF REVIEW	At § 1915A screening, the court accepts factual allegations as true but need not accept legal conclusions or conclusory statements; the complaint must state a claim upon which relief may be granted.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Thomas Jeff Henry v. S.W.V.R.J. — Duffield

TOPICS

- prisoners rights
- section 1983
- pleadings
- civil procedure

PRACTICE AREAS

prisoner civil rights

civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the complaint stated a claim under 42 U.S.C. § 1983 against the named jail.
2. Whether the complaint contained sufficient factual allegations to state a claim for relief under § 1983.

HOLDINGS

1. A jail is not a person within the meaning of 42 U.S.C. § 1983 and lacks the capacity to be sued under that statute.
2. A § 1983 complaint must provide factual allegations supporting an entitlement to relief, including facts identifying the alleged constitutional violation and, where applicable, each defendant's personal involvement; conclusory assertions that an arrest was unlawful and rights were violated are insufficient.

KEY QUOTATIONS

“A jail is not a person within the meaning of § 1983 and lacks the capacity to be sued.”

“The Complaint is lacking any factual allegations, only the legal conclusion that his arrest was unlawful and that his rights have been violated.”

FACTUAL BACKGROUND

Henry, a Virginia prisoner, alleged only that he had been unlawfully arrested and detained and that his civil rights had been violated. He named S.W.V.R.J. — Duffield, a jail, as the defendant. The complaint did not identify facts concerning the arrest, the alleged civil-rights violation, the constitutional rights implicated, or any defendant's personal involvement.

PROCEDURAL HISTORY

Henry filed a complaint alleging that he had been unjustly and illegally arrested and detained and that his civil rights had been violated. The district court conducted the required preliminary review under 28 U.S.C. § 1915A and dismissed the action because the complaint named a jail that is not a suable person under § 1983 and contained no factual allegations supporting a constitutional violation.

DISPOSITION

dismissed

CASES CITED

- Loftus v. Bobzien, 848 F.3d 278, 284-85 (4th Cir. 2017)
- McCoy v. Chesapeake Corr. Ctr., 788 F. Supp. 890, 893-94 (E.D. Va. 1992)
- Wilcox v. Brown, 877 F.3d 161, 170 (4th Cir. 2017)

- Langford v. Joyner, 62 F.4th 122, 124 (4th Cir. 2023)

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