

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, FAYETTEVILLE DIVISION

**Sarah Moore v. Patrick Deakins, in his official capacity as
Washington County Judge; Washington County, Arkansas; and
Returning Home, Inc.**

Moore v. Deakins · No. 5:25-CV-5123 · Decided February 25, 2026

SUMMARY

The court grants Washington County defendants’ Rule 12(b)(6) motion to dismiss Sarah Moore’s illegal-exaction and equal-protection claims without prejudice. The court holds that the amended complaint did not plausibly allege that the County violated federal procurement requirements or Arkansas’s single-source procurement documentation requirements in awarding substance-abuse-treatment funds to Returning Home. The equal-protection claim also fails because Moore did not allege intentional discrimination or that she personally suffered the required injury.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Fayetteville Division
JURISDICTION	United States District Court for the Western District of Arkansas, Fayetteville Division
DECIDED	February 25, 2026
DOCKET	5:25-CV-5123
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the amended complaint, which asserted illegal-exaction and equal-protection claims arising from the County's noncompetitive award of public and federal funds to Returning Home. The court granted the motion and dismissed the case without prejudice.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and determines whether the complaint contains sufficient factual matter to state a claim for relief that is plausible on its face. Labels, conclusions, formulaic recitations, and speculative allegations are insufficient.
PRECEDENTIAL VALUE	unpublished

PARTIES

Sarah Moore v. Patrick Deakins, in his official capacity as Washington County Judge, Washington County, Arkansas, Returning Home, Inc.

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QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that Washington County violated 2 C.F.R. § 200.320 by using a noncompetitive procurement method to award federal funds to Returning Home.
2. Whether Arkansas Code § 14-22-106(22)(B) requires supporting documentation concerning a single-source procurement to be attached to the county court order.
3. Whether Moore plausibly alleged an equal-protection violation based on the County's funding of a substance-abuse program serving male pretrial detainees.
4. Whether Moore had standing to assert the equal-protection claim as a taxpayer.

HOLDINGS

1. The amended complaint failed to state a plausible illegal-exaction claim based on 2 C.F.R. § 200.320 because it alleged no facts showing that Returning Home was not the only source capable of providing the contemplated services, that other providers could provide them, or that other providers had been consulted and expressed interest.
2. The statute requires supporting documentation concerning the exclusivity of a single source to exist and support the procurement, but it does not require that the documentation be physically attached to the county court order.
3. The equal-protection claim was subject to dismissal because Moore did not allege intentional or purposeful discrimination and did not allege that she personally was or likely would be eligible for the County's substance-abuse services.

KEY QUOTATIONS

“The statute only requires supporting documentation to exist and, presumably, to be maintained in County Defendants’ possession if requested.” (8)

“A taxpayer whose tax money is used in a discriminatory manner suffers no injury under the Equal Protection Clause unless and until the state’s expenditure of funds facilitates discrimination against her, personally.” (9)

FACTUAL BACKGROUND

Washington County sought to establish a substance-abuse treatment program for pretrial detainees and awarded Returning Home a contract using federal grant funds passed through the Arkansas Department of Finance and Administration, together with County funds. A January 2025 County Court Order stated that Returning Home was uniquely situated to provide the contemplated services at the required scale and that no other local providers had expressed interest, but Moore alleged that the County failed to use competitive bidding or obtain advance federal approval. Moore also alleged that the County failed to provide supporting documentation concerning the single-source procurement and that Returning Home's program served male, but not female, detainees.

PROCEDURAL HISTORY

Moore filed an amended complaint challenging Washington County's funding of Returning Home's substance-abuse treatment program for pretrial detainees. The Washington County Defendants moved to dismiss for failure to state a plausible claim; Moore opposed and defendants replied. The court granted the motion, terminated the remaining motions, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Pledger v. Featherlite Precast Corp., 308 Ark. 124, 128 (1992)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 556 (2007)
- Benton v. Merrill Lynch & Co., Inc., 524 F.3d 866, 870 (8th Cir. 2008)
- Klinger v. Dep't of Corr., 31 F.3d 727, 733 (8th Cir. 1994)
- Booth v. Hvass, 302 F.3d 849, 854 (8th Cir. 2002)
- Flast v. Cohen, 392 U.S. 83, 103 (1968)