

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Sean M. Doughty v. Johnathan B. Davis; Deputy R. Martin; Gem
County Sheriff's Department; and State of Idaho

Doughty v. Davis · No. 1:25-cv-00529-BLW · Decided December 5, 2025

SUMMARY

The United States District Court for the District of Idaho conducts an initial screening of Sean M. Doughty’s prisoner civil-rights complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b). The court permits Doughty to proceed on a Fourth Amendment excessive-force claim against Officer Johnathan B. Davis based on alleged sexual abuse during a search, while dismissing the claims against the other defendants and denying appointment of counsel. The order also addresses service, amendment, filing, and case-management requirements.

CASE DETAILS

COURT	United States District Court for the District of Idaho
JURISDICTION	United States District Court for the District of Idaho
DECIDED	December 5, 2025
DOCKET	1:25-cv-00529-BLW
DISPOSITION	other
PROCEDURAL POSTURE	Initial screening of an incarcerated plaintiff's conditionally filed in forma pauperis civil-rights complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b).
STANDARD OF REVIEW	The court screened the complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), accepting well-pleaded factual allegations as true and applying the plausibility standard under Federal Rule of Civil Procedure 8(a)(2) and the principles of Rule 12(b)(6). The court liberally construed the pro se pleading but did not consider exhibits attached to the complaint.
PRECEDENTIAL VALUE	unknown
PARTIES	Sean M. Doughty v. Johnathan B. Davis, Deputy R. Martin, Gem County Sheriff's Department, State of Idaho

TOPICS

section 1983

prisoners rights

police misconduct

pleadings

civil rights

PRACTICE AREAS

civil rights

constitutional law

prisoner civil rights

federal civil procedure

remedies

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated a Fourth Amendment excessive-force claim against Davis based on alleged sexual abuse during a search or arrest.
2. Whether the complaint stated viable § 1983 claims against Martin, the Gem County Sheriff's Department, or the State of Idaho.
3. Whether the complaint stated an actionable state-law or Idaho constitutional claim.
4. Whether Doughty demonstrated exceptional circumstances warranting appointment of counsel.

HOLDINGS

1. The complaint, liberally construed, plausibly stated a Fourth Amendment excessive-force claim against Davis based on the alleged sexual abuse during the course of Doughty's arrest, so that claim could proceed beyond screening.
2. The complaint did not state a Fourth Amendment claim merely by alleging that the officers lacked a warrant because a warrant is not required for every search or seizure.
3. The complaint failed to state a plausible § 1983 excessive-force claim against Martin.
4. The complaint failed to state a plausible Monell claim against the Gem County Sheriff's Department.
5. The § 1983 claims against the State of Idaho were implausible because a state is not a person subject to suit under § 1983 and is immune from suit in federal court under the Eleventh Amendment.
6. The complaint failed to state a plausible state-law claim, including a claim based on Article I, section 17 of the Idaho Constitution, because Idaho does not recognize a direct cause of action for violations of the Idaho Constitution.
7. Appointment of counsel was denied because Doughty did not demonstrate exceptional circumstances.

KEY QUOTATIONS

“There is obviously no government interest in sexual misconduct.” (Discussion § 3.A)

““Gratuitous and completely unnecessary acts of violence,” including sexual abuse, “by the police during a seizure violate the Fourth Amendment.”” (Discussion § 3.A)

FACTUAL BACKGROUND

Doughty, an Idaho prisoner, alleged that on September 13, 2024, Gem County officers Johnathan B. Davis and R. Martin searched him on private property. He alleged that Davis pulled down his pants and sexually felt around the front of his genitals during the search. He sued the officers, the Gem County Sheriff's Department, and the State of Idaho under 42 U.S.C. § 1983 and sought monetary and injunctive relief.

PROCEDURAL HISTORY

The Clerk conditionally filed Doughty's complaint because he was an inmate proceeding or seeking to proceed in forma pauperis. On initial review, the court permitted a Fourth Amendment excessive-force claim based on alleged sexual abuse to proceed against Defendant Davis, dismissed all other claims against all other defendants, terminated Martin, the Gem County Sheriff's Department, and the State of Idaho as parties, and denied appointment of counsel.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 677–79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555–56 (2007)
- Jackson v. Arizona, 885 F.2d 639, 640 (9th Cir. 1989)
- Crumpton v. Gates, 947 F.2d 1418, 1420 (9th Cir. 1991)
- Johnson v. Duffy, 588 F.2d 740, 743 (9th Cir. 1978)
- Taylor v. List, 880 F.2d 1040, 1045 (9th Cir. 1989)
- Starr v. Baca, 652 F.3d 1202, 1205–09 (9th Cir. 2011)
- Hansen v. Black, 885 F.2d 642, 646 (9th Cir. 1989)
- 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)
- Soldal v. Cook County, 506 U.S. 56, 61 (1992)
- Brigham City v. Stuart, 547 U.S. 398, 403 (2006)
- Fontana v. Haskin, 262 F.3d 871, 878–81 (9th Cir. 2001)
- Graham v. Connor, 490 U.S. 386, 396–97 (1989)
- Davis v. City of Las Vegas, 478 F.3d 1048, 1053–54 (9th Cir. 2007)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Hans v. Louisiana, 134 U.S. 1, 16–18 (1890)
- Pennhurst State School & Hospital v. Halderman, 465 U.S. 89, 100 (1984)
- Quern v. Jordan, 440 U.S. 332, 342–44 (1979)
- Esquibel v. Idaho, No. 1:11-cv-00606-BLW, 2012 WL 1410105, at *6 (D. Idaho Apr. 23, 2012)
- Hill v. County of Benewah, No. 2:18-CV-00320-DCN, 2020 WL 1049905, at *7 (D. Idaho Mar. 4, 2020)
- 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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