

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS

David Velazquez-Diaz v. Rachel Young, Karas Correctional Health
(KCH); Dr. Robert Karas, KCH; Kelley Hinely, KCH; Dustin
Sanders, KCH; Jordan Provenas, KCH; Jacob Smothers, KCH; John
and Jane Doe Employees of KCH; and Sheriff Jay Cantrell,
Washington County, Arkansas

Velazquez-Diaz v. Young · No. 5:24-CV-5212 · Decided December 18, 2025

SUMMARY

The United States District Court for the Western District of Arkansas overruled the plaintiff’s objection to a magistrate judge’s Report and Recommendation concerning exhaustion of administrative remedies under the Prison Litigation Reform Act. The court held that the detention center’s grievance policy required inmates to identify the individuals involved, and the plaintiff’s grievances did not name Sheriff Jay Cantrell or jail officers in connection with the alleged failure to train or supervise medical personnel. The court adopted the Report and Recommendation, granted Cantrell’s motion for summary judgment, and dismissed the claims against him without prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas
WRITING FOR THE COURT	Timothy L. Brooks
JURISDICTION	United States District Court for the Western District of Arkansas
DECIDED	December 18, 2025
DOCKET	5:24-CV-5212
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's report and recommendation after the plaintiff objected to the recommendation that Sheriff Jay Cantrell's motion for summary judgment based on failure to exhaust administrative remedies be granted.
STANDARD OF REVIEW	De novo review of the record following an objection to the report and recommendation.

TOPICS

summary judgment

prisoners rights

section 1983

civil rights

civil procedure

PRACTICE AREAS

prisoner civil rights

civil procedure

administrative exhaustion

deliberate indifference to medical needs

QUESTIONS PRESENTED

1. Whether the plaintiff exhausted administrative remedies as to his failure-to-train and failure-to-supervise claims against Sheriff Cantrell when the jail grievance policy required inmates to identify by name the staff members involved and the plaintiff did not name Cantrell or any jailer in his grievances.
2. Whether summary judgment and dismissal without prejudice were proper for failure to exhaust administrative remedies under the Prison Litigation Reform Act.

HOLDINGS

1. When a detention center's grievance policy requires an inmate to name each individual involved in the complained-of incident, that requirement controls for purposes of exhaustion under the Prison Litigation Reform Act.
2. General grievances about the quality of medical care or disagreement with a treatment decision do not exhaust claims against a jail administrator for failing to train or supervise medical personnel when the administrator is not identified in the grievances.

KEY QUOTATIONS

“A general grievance about the quality of care or disagreement with a treatment decision is not the same thing as identifying a jailer or jail administrator by name for failing to train or supervise a medical professional.”

“Because the WCDC’s grievance process expressly requires an inmate submitting a grievance to “state fully the . . . names of those Detention Officers and/or staff members involved and pertinent details of the incident,””

FACTUAL BACKGROUND

Velazquez-Diaz alleged that employees of Karas Correctional Health were deliberately indifferent to his medical needs and that Sheriff Jay Cantrell failed to train or supervise jail staff and KCH personnel regarding inmate medical care. He did not allege that Cantrell personally committed medical neglect. Although he filed and appealed several medical grievances through the jail kiosk system, none identified Cantrell or any detention officer by name or accused them of failing to take corrective action.

PROCEDURAL HISTORY

Magistrate Judge Christy Comstock recommended granting Sheriff Cantrell's motion for summary judgment for failure to exhaust administrative remedies. Plaintiff David Velazquez-Diaz objected, triggering de novo review. The district court overruled the objection, adopted the report and recommendation in its entirety, granted the motion, and dismissed the claims against Cantrell without prejudice.

DISPOSITION

dismissed

CASES CITED

- West v. Atkins, 487 U.S. 42, 56 (1988)
- Burns v. Eaton, 752 F.3d 1136, 1141 (8th Cir. 2014)

OPINION

Velazquez-Diaz

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF ARKANSAS

FAYETTEVILLE DIVISION

DAVID VELAZQUEZ-DIAZ PLAINTIFF

V. CASE NO. 5:24-CV-5212

RACHEL YOUNG, Karas Correctional Health (KCH); DR. ROBERT KARAS, KCH; KELLEY HINELY, KCH; DUSTIN SANDERS, KCH; JORDAN PROVENAS, KCH;

JACOB SMOTHERS, KCH; JOHN AND JANE DOE

EMPLOYEES OF KCH; and SHERIFF JAY CANTRELL,

Washington County, Arkansas DEFENDANTS

ORDER

Before the Court is the Report and Recommendation (“R&R”) (Doc. 44) filed on November 18, 2025, by the Honorable Christy Comstock, United States Magistrate Judge for the Western District of Arkansas. She recommends that Separate Defendant Sheriff Jay Cantrell’s Motion for Summary Judgment for Failure to Exhaust Administrative Remedies (Doc. 20) be granted. On December 5, 2025, Plaintiff David Velazquez-Diaz filed an Objection to the R&R (Doc. 45), which triggered this Court's de novo review of the record. Mr. Velazquez-Diaz alleges in his Second Amended Complaint (Doc. 8) that six employees of Karas Correctional Health (“KCH”)—a third-party contractor that provides medical care to inmates at the Washington County Detention Center (“WCDC”)—were deliberately indifferent to his medical needs. Separately, he alleges that Defendant Cantrell, in his capacity as administrator of the WCDC, failed to adequately supervise or train jail staff to assure that inmates were receiving adequate medical care and to supervise KCH employees to assure they were providing adequate care. Mr. Velazquez-Diaz does not allege

that Defendant Cantrell personally committed medical neglect. Further, it is undisputed that Mr. Velazquez-Diaz filed several grievances about his medical care through the jail kiosk system, but none of those grievances identified Defendant Cantrell or detention officers by name. Because the WCDC's grievance process expressly requires an inmate submitting a grievance to "state fully the . . . names of those Detention Officers and/or staff members involved and pertinent details of the incident," see Doc. 22-4, p. 2, and Mr. Velazquez-Diaz failed to do this with respect to Defendant Cantrell, Judge Comstock believes the claims against Defendant Cantrell are subject to dismissal under the Prison Litigation Reform Act for failure to exhaust administrative remedies prior to filing suit. Mr. Velazquez-Diaz argues in his Objection that Defendant Cantrell, as administrator of the WCDC, "should be responsible for any neglect suffered by the inmates—regardless of . . . his knowledge or [whether he] was not named in any of the grievances or appeals." (Doc. 45, p. 2). In Mr. Velazquez-Diaz's view, he has exhausted his remedies with respect to his claims against Defendant Cantrell by filing and appealing medical grievances—which should have been enough to put Defendant Cantrell on notice of his failure to train or supervise the medical personnel. In general, "[c]ontracting out prison medical care does not relieve the [county] of its constitutional duty to provide adequate medical treatment to those in its custody, and it does not deprive the [county]'s prisoners of the means to vindicate their Eighth Amendment rights." *West v. Atkins*, 487 U.S. 42, 56 (1988). However, when a detention center's grievance policy requires an inmate to name each individual involved in the incident being complained of, then that requirement controls for purposes of exhaustion under the PLRA. See *Bums v. Eaton*, 752 F.3d 1136, 1141 (8th Cir. 2014). Here, there is no dispute that Mr. Velazquez-Diaz failed to identify Defendant Cantrell or any WCDC jailer by name in any grievance and accuse them of failing to take corrective action with respect to his medical care. A general grievance about the quality of care or disagreement with a treatment decision is not the same thing as identifying a jailer or jail administrator by name for failing to train or supervise a medical professional. The Objection to the R&R is **OVERRULED**. IT IS THEREFORE ORDERED that the R&R (Doc. 44) is **ADOPTED IN ITS ENTIRETY**. Defendant Sheriff Jay Cantrell's Motion for Summary Judgment (Doc. 20) is **GRANTED**, and Plaintiff's claims against him are **DISMISSED WITHOUT PREJUDICE**. This case remains referred to the Magistrate Judge. IT IS SO ORDERED on this 10th day of October 2025. □ _

TIMO WAY L "BROOKS

CHIEF UNITED STATES DISTRICT JUDGE