

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE

Joseph Anthony Szostak, III v. Rutherford County Adult Detention
Center, et al.

No. 3:25-cv-01188 · No. No. 3:25-cv-01188 · Decided April 15, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee dismissed Joseph Szostak's pro se 42 U.S.C. § 1983 action against the Rutherford County Adult Detention Center and other defendants. The court held that allegations concerning the plaintiff's inability to eat corn-containing meals did not plausibly establish a substantial risk of serious harm or deprivation of a constitutionally adequate diet under the Fourteenth Amendment. The dismissal was entered under 28 U.S.C. §§ 1915(e)(2)(B)(ii) and 1915A(b)(1) for failure to state a claim.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee
WRITING FOR THE COURT	William L. Campbell
JURISDICTION	United States District Court for the Middle District of Tennessee
DECIDED	April 15, 2026
DOCKET	No. 3:25-cv-01188
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial review of a pro se prisoner's amended 42 U.S.C. § 1983 complaint under the Prison Litigation Reform Act.
STANDARD OF REVIEW	The court reviewed the amended complaint under the screening standards of 28 U.S.C. §§ 1915(e)(2) and 1915A, applying the plausibility standard applicable to a Rule 12(b)(6) motion. Well-pleaded factual allegations and reasonable inferences were accepted as true, but legal conclusions and unwarranted factual inferences were not.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion and order; persuasive rather than precedential.
PARTIES	Joseph Anthony Szostak, III v. Rutherford County Adult Detention Center, et al.

TOPICS

section 1983 prisoners rights fourteenth amendment civil procedure motions to dismiss

PRACTICE AREAS

Civil rights constitutional law prisoner litigation federal civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that the detention center's failure to provide substitute food for Plaintiff's corn allergy deprived him of a constitutional right under the Fourteenth Amendment.
2. Whether Plaintiff plausibly alleged that the food provided was insufficient to maintain normal health or otherwise posed a substantial risk of serious harm.

HOLDINGS

1. The amended complaint failed to state a constitutional claim because Plaintiff did not allege that the food provided was nutritionally or calorically insufficient to maintain normal health, or that the meals caused substantial weight loss, deteriorated health, or another specific physical harm.
2. The action was dismissed under 28 U.S.C. §§ 1915(e)(2)(B)(ii) and 1915A(b)(1) for failure to state a claim upon which relief may be granted.

KEY QUOTATIONS

“The Constitution requires only that the food provided to him have caloric and nutrient content “sufficient to maintain normal health.” ”

“In sum, the Amended Complaint fails plausibly to allege any deprivation of Plaintiff’s constitutional rights.”

FACTUAL BACKGROUND

Plaintiff alleged that he was allergic to corn, that the detention center knew of the allergy, and that he was served 444 meal trays containing corn between February 2025 and January 2026. The detention center provided special meals for certain dietary needs but did not provide a substitute for inmates with other food allergies, and staff allegedly told Plaintiff to eat around the corn. Plaintiff claimed that he was underfed compared with other inmates and sought damages and an order requiring the detention center to obtain a new nutrition provider.

PROCEDURAL HISTORY

Plaintiff, an inmate proceeding pro se and in forma pauperis, filed a civil rights complaint. The court granted leave to proceed as a pauper and permitted an amended complaint, which Plaintiff filed on January 13, 2026. On initial review under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court dismissed the action for failure to state a claim and denied the remaining pending motions as moot.

DISPOSITION

dismissed

CASES CITED

- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Carl v. Muskegon Cnty., 763 F.3d 592, 595 (6th Cir. 2014)
- Nat'l Rifle Ass'n of Am. v. Vullo, 602 U.S. 175, 181 (2024)
- Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan, 87 F.4th 743, 749 (6th Cir. 2023)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Brawner v. Scott Cnty., 14 F.4th 585, 591 (6th Cir. 2021)
- Assi v. Hanshaw, 625 F. Supp. 3d 722, 745-46 (S.D. Ohio 2022)
- Farmer v. Brennan, 511 U.S. 825, 834 (1994)
- Rice v. Lewis, No. 4:23-CV-P33-JHM, 2023 WL 4166110, at *2-*3 (W.D. Ky. June 23, 2023)
- Corbett v. Sgt. Hall, No. 4:23-CV-00141-MW-MAF, 2024 WL 3278988, at *5 (N.D. Fla. June 13, 2024), report and recommendation adopted, 2024 WL 3276230 (N.D. Fla. July 2, 2024)
- Berry v. Brady, 192 F.3d 504, 508 (5th Cir. 1999)
- Sanders v. Collier, No. 6:22CV139, 2024 WL 5150675, at *7 (E.D. Tex. Sept. 26, 2024), report and recommendation adopted, 2024 WL 5145950 (E.D. Tex. Dec. 17, 2024)
- Cunningham v. Jones, 567 F.2d 653, 660 (6th Cir. 1977)
- Kemp v. Drago, No. CA 1:12-1481-JFA-SVH, 2013 WL 4874972, at *9 (D.S.C. Sept. 11, 2013), aff'd, 558 F. App'x 328 (4th Cir. 2014)

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