

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Francisco Bautista v. Ada County Jail Medical Services and  
Unnamed and Unknown Individuals

Bautista · No. 1:25-cv-00491-BLW · Decided December 5, 2025

SUMMARY

The United States District Court for the District of Idaho screened Francisco Bautista’s § 1983 complaint alleging inadequate medical treatment for a right-eye condition while he was incarcerated at the Ada County Jail. The court concluded that the complaint failed to plausibly allege Eighth Amendment deliberate indifference or municipal liability under Monell, but granted Bautista 28 days to file an amended complaint. The court denied his request for appointed counsel without prejudice and warned that failure to amend could result in dismissal.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                     |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Idaho                                                                                                                                                                                                              |
| WRITING FOR THE COURT | B. Lynn Winmill                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the District of Idaho                                                                                                                                                                                                              |
| DECIDED               | December 5, 2025                                                                                                                                                                                                                                                    |
| DOCKET                | 1:25-cv-00491-BLW                                                                                                                                                                                                                                                   |
| DISPOSITION           | other                                                                                                                                                                                                                                                               |
| PROCEDURAL POSTURE    | Initial screening order under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b) in a prisoner civil-rights action filed in forma pauperis. The court concluded that the complaint failed to state a claim but permitted plaintiff 28 days to amend.                           |
| STANDARD OF REVIEW    | The court screened the complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), accepting factual allegations as true and applying the Federal Rule of Civil Procedure 8 plausibility standard articulated in Ashcroft v. Iqbal and Bell Atlantic Corp. v. Twombly. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                     |
| PARTIES               | Francisco Bautista v. Ada County Jail Medical Services, Unnamed and Unknown Individuals                                                                                                                                                                             |

TOPICS

section 1983

prisoners rights

civil rights

pleadings

health law

## PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

civil procedure

health law

## QUESTIONS PRESENTED

1. Whether the complaint plausibly stated an Eighth Amendment deliberate-indifference claim based on the alleged delay or inadequacy of medical treatment.
2. Whether the complaint stated a claim under 42 U.S.C. § 1983 against Ada County Medical Services without alleging a policy, custom, ratification, or final policymaker decision causing the alleged injury.
3. What factual and pleading requirements an amended complaint must satisfy to proceed past screening.

## HOLDINGS

1. The complaint failed to state a plausible Eighth Amendment claim because, at most, it alleged that unidentified jail medical personnel were negligent in failing to recognize the seriousness of Bautista's eye condition; negligence or medical malpractice is insufficient to establish deliberate indifference.
2. The complaint failed to state a municipal-liability claim because it did not allege that a policy, custom, final policymaker decision, or ratification by Ada County caused the alleged inadequate medical treatment.
3. Bautista was permitted 28 days to file an amended complaint that identifies each defendant, states the factual and legal basis for each claim, alleges causation and injury, and satisfies Rule 8 and the applicable § 1983 and Eighth Amendment standards.

## KEY QUOTATIONS

*“A complaint fails to state a claim for relief under Rule 8 if the factual assertions in the complaint, taken as true, are insufficient for the reviewing court plausibly “to draw the reasonable inference that the defendant is liable for the misconduct alleged.”” (Section 1)*

*“A defendant may be held liable as a supervisor under § 1983 ‘if there exists ... a sufficient causal connection between the supervisor’s wrongful conduct and the constitutional violation.’” (Section 3.A)*

*“The Complaint plausibly suggests, at most, that unidentified jail medical personnel might have been negligent in failing to recognize that Plaintiff had a serious eye condition.” (Section 3.B)*

*“The Complaint fails to state a claim upon which relief may be granted. Plaintiff has 28 days within which to file an amended complaint as described above.” (Order paragraph 1)*

## FACTUAL BACKGROUND

Bautista, an Idaho prisoner, alleged that while incarcerated at the Ada County Jail he experienced a deteriorating right-eye condition over several months and sent numerous requests for medical treatment. He alleged that jail medical personnel told him that nothing was seriously wrong and that, four or five months after his symptoms

began, an outside optometrist stated that the delay had caused irreparable damage and vision loss. Bautista did not identify the individual medical providers involved and did not allege facts showing that Ada County Medical Services acted pursuant to a policy, custom, or practice.

## PROCEDURAL HISTORY

The Clerk conditionally filed Bautista's complaint because he was an inmate seeking to proceed in forma pauperis. After screening the complaint, the court found that the allegations did not plausibly state an Eighth Amendment or municipal-liability claim. The court directed Bautista to file an amended complaint within 28 days, denied appointment of counsel without prejudice, and warned that failure to amend could result in dismissal.

## 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)
- Lopez v. Smith, 203 F.3d 1122, 1130 (9th Cir. 2000)
- 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)
- Farmer v. Brennan, 511 U.S. 825, 834-35, 837, 844 (1994)
- Snow v. McDaniel, 681 F.3d 978, 985 (9th Cir. 2012)
- Peralta v. Dillard, 744 F.3d 1076 (9th Cir. 2014) (en banc)
- Estelle v. Gamble, 429 U.S. 97, 104-06 (1976)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- McGuckin v. Smith, 974 F.2d 1050, 1059-60 (9th Cir. 1992)
- WMX Technologies, Inc. v. Miller, 104 F.3d 1133 (9th Cir. 1997) (en banc)

- Gibson v. County of Washoe, 290 F.3d 1175, 1187-88 (9th Cir. 2002)
- Toguchi v. Chung, 391 F.3d 1051, 1057-61 (9th Cir. 2004)
- Roberts v. Spalding, 783 F.2d 867, 870 (9th Cir. 1986)
- Sanchez v. Vild, 891 F.2d 240, 242 (9th Cir. 1989)
- Jackson v. McIntosh, 90 F.3d 330, 332 (9th Cir. 1996)
- Norsworthy v. Beard, 87 F. Supp. 3d 1104, 1117 (N.D. Cal. 2015)
- Collignon v. Milwaukee County, 163 F.3d 982, 989 (7th Cir. 1998)
- Lamb v. Norwood, 899 F.3d 1159, 1162 (10th Cir. 2018)
- Ellis v. Cassidy, 625 F.2d 227, 229 (9th Cir. 1980)
- Kay v. Ehrler, 499 U.S. 432 (1991)
- Ivey v. Board of Regents of the University of Alaska, 673 F.2d 266, 268 (9th Cir. 1982)
- 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., Inc., 896 F.2d 1542, 1546 (9th Cir. 1990)
- Knapp v. Hogan, 738 F.3d 1106, 1110 (9th Cir. 2013)
- Spencer v. Barajas, 140 F.4th 1061, 1066 (9th Cir. 2025)

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