

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Richard Hayes v. Prison Administration, et al.

Hayes · No. 1:25-CV-1823 · Decided November 21, 2025

SUMMARY

The court dismissed Richard Hayes’s prisoner civil rights complaint without prejudice under 28 U.S.C. §§ 1915(e)(2) and 1915A for failure to state a claim. The court found that Hayes’s conclusory allegations of assault and unsanitary conditions were insufficient and that Lebanon County Prison and Prison Administration were not proper defendants under 42 U.S.C. § 1983. Hayes was granted leave to proceed in forma pauperis and to file an amended complaint naming personally involved individual defendants.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Keli M. Neary
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	November 21, 2025
DOCKET	1:25-CV-1823
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner filed a civil rights action under 42 U.S.C. § 1983. The district court screened the complaint under the Prison Litigation Reform Act and dismissed it without prejudice for failure to state a claim, while granting leave to amend.
STANDARD OF REVIEW	The court applied the Rule 12(b)(6) failure-to-state-a-claim standard during screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), accepting well-pleaded factual allegations as true, construing them in the plaintiff's favor, disregarding mere legal conclusions, and determining whether the complaint stated a plausible claim for relief.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Richard Hayes v. Prison Administration, et al.

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

pleadings

motions to dismiss

PRACTICE AREAS

civil rights

prisoner civil rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Hayes's conclusory allegations of assault and unsanitary conditions stated a plausible Eighth Amendment claim under 42 U.S.C. § 1983.
2. Whether Lebanon County Prison and Prison Administration were proper defendants in a § 1983 action.
3. Whether Hayes should be granted leave to amend before dismissal of the civil rights complaint.

HOLDINGS

1. The complaint failed to state a claim because its conclusory and unsupported allegations that Hayes was assaulted and subjected to unsanitary conditions did not provide sufficient facts to establish a plausible constitutional violation.
2. A county prison is not a proper defendant in a § 1983 civil rights action, and Hayes could not proceed against Lebanon County Prison as named.
3. Leave to amend was required because the court could not conclude that amendment would be inequitable or futile.

KEY QUOTATIONS

“Before dismissing a civil rights complaint for failure to state a claim, courts must permit a curative amendment unless the amendment would be inequitable or futile.”

“His conclusory and unsupported allegations that he was “assaulted” and subjected to “unsanitary conditions,” however, are completely inadequate to state claims upon which relief may be granted.”

FACTUAL BACKGROUND

Hayes was detained at the Lebanon County Correctional Facility and alleged that correctional officers assaulted and mistreated him, that he experienced unsanitary conditions, and that he felt unsafe. His complaint identified Lebanon County Prison and Prison Administration as defendants, but provided only conclusory allegations and sought compensation and initiation of criminal charges.

PROCEDURAL HISTORY

Hayes filed the action on September 22, 2025, and it was received and docketed on September 30, 2025. On initial screening, the court concluded that the complaint's conclusory allegations of assault and unsanitary conditions failed to state a claim and that the county prison was not a proper § 1983 defendant. The court dismissed the complaint without prejudice, granted in forma pauperis status, and allowed Hayes to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- Coward v. City of Philadelphia, 546 F. Supp. 3d 331, 333 (E.D. Pa. 2021)
- Smith v. Delaware, 236 F. Supp. 3d 882, 886 (D. Del. 2017)
- Phillips v. County of Allegheny, 515 F.3d 224, 232-33, 245 (3d Cir. 2008)
- Pinker v. Roche Holdings, Ltd., 292 F.3d 361, 374 n.7 (3d Cir. 2002)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Santiago v. Warminster Township, 629 F.3d 121, 130-32 (3d Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 675, 678-79 (2009)
- Fowler v. UPMC Shadyside, 578 F.3d 203, 210-11 (3d Cir. 2009)
- Sause v. Bauer, 585 U.S. 957, 960 (2018)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Gonzaga Univ. v. Doe, 536 U.S. 273, 284-85 (2002)
- Kneipp v. Tedder, 95 F.3d 1199, 1204 (3d Cir. 1996)
- Mark v. Borough of Hatboro, 51 F.3d 1137, 1141 (3d Cir. 1995)
- Edwards v. Northampton County, 663 F. App'x 132, 136 (3d Cir. 2016)
- Beaver v. Union County Pennsylvania, 619 F. App'x 80, 83 (3d Cir. 2015)
- Lenhart v. Pennsylvania, 528 F. App'x 111, 114 (3d Cir. 2013)