

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, ALEXANDRIA DIVISION

Childs v. Rappahannock Regional Jail

No. 1:25cv1737 (RDA/IDD) · No. No. 1:25cv1737 (RDA/IDD) · Decided May 6, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia screens Christopher L. Childs’s pro se 42 U.S.C. § 1983 complaint alleging inadequate medical care at Rappahannock Regional Jail. The court dismisses the jail as a defendant with prejudice because it is not a person subject to suit under § 1983, but permits Childs to amend his complaint to identify individual defendants and provide specific facts supporting his Eighth Amendment claim. The order warns that failure to amend within thirty days may result in dismissal.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Alexandria Division
WRITING FOR THE COURT	D. Alston, Jr.
JURISDICTION	United States District Court for the Eastern District of Virginia
DECIDED	May 6, 2026
DOCKET	No. 1:25cv1737 (RDA/IDD)
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prisoner civil-rights complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court screens the complaint for frivolousness, maliciousness, failure to state a claim, or claims against immune defendants, applying the same pleading standard used under Federal Rule of Civil Procedure 12(b)(6). The complaint must contain sufficient factual matter to state a plausible claim for relief.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; nonprecedential status not otherwise specified in the opinion.
PARTIES	Christopher L. Childs v. Rappahannock Regional Jail

TOPICS

section 1983

prisoners rights

civil rights

motions to dismiss

civil procedure

PRACTICE AREAS

Civil rights litigation

Prisoner litigation

Federal civil procedure

Eighth Amendment medical care

QUESTIONS PRESENTED

1. Whether Rappahannock Regional Jail is a person subject to suit under 42 U.S.C. § 1983.
2. Whether the complaint plausibly alleged an Eighth Amendment claim for deliberate indifference to serious medical needs.
3. Whether Childs should be permitted to amend the deficient complaint.

HOLDINGS

1. A jail is not a legal entity or person subject to suit under § 1983; therefore, Rappahannock Regional Jail was dismissed with prejudice as a defendant.
2. The complaint failed to state a plausible Eighth Amendment claim because it did not identify a sufficiently serious medical need or allege deliberate indifference by a proper defendant.
3. The court allowed Childs thirty days to file an amended complaint that identifies each defendant, states the federal right allegedly violated, and pleads specific facts, dates, and conduct supporting each claim.

KEY QUOTATIONS

“Because a jail is not a legal entity, it is not a ‘person’ subject to suit under § 1983.” (at 2)

“Thus, Plaintiff must allege two distinct elements to state a claim upon which relief can be granted.” (at 2)

FACTUAL BACKGROUND

Childs, a Virginia inmate detained at Rappahannock Regional Jail, alleged that he did not receive adequate medical care and requested mental-health treatment because of a lack of medication. The complaint did not identify a serious medical need, did not allege facts showing deliberate indifference, and did not provide dates for the alleged denial of care. Rappahannock Regional Jail was the only named defendant.

PROCEDURAL HISTORY

Childs filed a pro se complaint under 42 U.S.C. § 1983 alleging inadequate medical care in violation of the Eighth Amendment. The district court screened the complaint, dismissed Rappahannock Regional Jail with prejudice as a defendant, and granted Childs thirty days to file an amended complaint identifying proper defendants and providing particularized factual allegations.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Nemet Chevrolet, Ltd. v. Consumeraffairs.com, Inc., 591 F.3d 250, 256 (4th Cir. 2009)
- Robinson v. American Honda Motor Co., 551 F.3d 218, 222 (4th Cir. 2009)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Jennings v. Emry, 910 F.2d 1434, 1436 (7th Cir. 1990)
- Dales v. Haysi Regional Jail, No. 7:16cv386, 2016 WL 7168278, at *1 (W.D. Va. Dec. 8, 2016)
- McCoy v. Chesapeake Correctional Center, 788 F. Supp. 890, 894 (E.D. Va. 1992), aff'd, 9 F.3d 1544 (4th Cir. 1993) (table)
- Painter v. Blue Ridge Regional Jail Authority, No. 6:17cv34, 2017 WL 3725993, at *5 (W.D. Va. Aug. 29, 2017)
- Preval v. Reno, 203 F.3d 821, at *1 (4th Cir. Jan. 13, 2000) (per curiam) (unpublished)
- Preval v. Reno, 57 F. Supp. 2d 307, 310 (E.D. Va. 1999)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Estelle v. Gamble, 429 U.S. 97, 105-06 (1976)
- Staples v. Virginia Department of Corrections, 904 F. Supp. 487, 492 (E.D. Va. 1995)
- Young v. City of Mount Ranier, 238 F.3d 567, 576 (4th Cir. 2001)
- Miltier v. Beorn, Miltier v. Beorn, 896 F.2d 848, 851 (4th Cir. 1990)
- Wright v. Collins, 766 F.2d 841, 849 (4th Cir. 1985)
- Harris v. Murray, 761 F. Supp. 409, 414 (E.D. Va. 1990)
- Rhodes v. Robinson, 621 F.3d 1002, 1005 (9th Cir. 2010)