

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Rafael Soto v. Jack Johnson and Twin Falls County Adult Detention Center

Soto v. Johnson · No. 1:25-cv-00493-BLW · Decided April 3, 2026

SUMMARY

The United States District Court for the District of Idaho screened Rafael Soto’s amended prisoner civil rights complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A. The court held that the allegations concerning pork-free meals did not plausibly establish violations of the First Amendment’s Free Exercise Clause or the Fourteenth Amendment’s Equal Protection Clause. The court denied appointment of counsel and dismissed the case with prejudice without further leave to amend.

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	April 3, 2026
DOCKET	1:25-cv-00493-BLW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Successive screening review of a prisoner's amended civil-rights complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A.
STANDARD OF REVIEW	The court reviewed the amended prisoner complaint under the screening standards of 28 U.S.C. §§ 1915(e)(2) and 1915A(b), accepting well-pleaded factual allegations as true and determining whether they plausibly stated a claim under Federal Rule of Civil Procedure 8(a)(2).
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Rafael Soto v. Jack Johnson, Twin Falls County Adult Detention Center

TOPICS

- prisoners rights
- section 1983
- free exercise clause
- equal protection
- pleadings

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

pro se litigation

QUESTIONS PRESENTED

1. Whether appointment of counsel was warranted in this civil-rights action.
2. Whether the amended complaint plausibly stated a First Amendment free-exercise claim based on the possibility that Soto was served pork.
3. Whether the amended complaint plausibly stated a Fourteenth Amendment equal-protection claim.
4. Whether the amended complaint should be dismissed with prejudice after Soto failed to cure the deficiencies identified in the original complaint.

HOLDINGS

1. Appointment of counsel was not warranted because the case did not present exceptional circumstances, Soto had demonstrated an ability to articulate his claims, and the amended complaint did not show a likelihood of success on the merits.
2. The amended complaint was subject to dismissal because it failed to state a claim upon which relief could be granted under the screening statutes and Rule 8's plausibility standard.
3. The amended complaint did not plausibly state a free-exercise claim because Soto did not allege that avoiding pork was required by a religion or that the possibility of being served pork imposed a substantial burden on religious exercise.
4. The amended complaint did not plausibly state an equal-protection claim because it did not allege intentional and arbitrary discrimination.
5. Dismissal with prejudice and without further leave to amend was appropriate because Soto had already received an opportunity to amend and still failed to state a plausible claim.

KEY QUOTATIONS

“This is insufficient to support a reasonable inference that the possibility that Plaintiff might have been served pork on an unknown number of occasions constitutes a substantial burden on Plaintiff’s religious exercise.”
(at 3)

“Because Plaintiff has already been given the opportunity to amend and still has failed to state a plausible claim for relief, the Court will dismiss the Amended Complaint with prejudice and without further leave to amend.” (at 6)

FACTUAL BACKGROUND

Soto, a prisoner proceeding without counsel, alleged that officials at the Twin Falls County Jail failed to ensure that he would never be served pork. He asserted that this violated his First Amendment right to free exercise of religion and his Fourteenth Amendment right to equal protection. The amended complaint did not identify Soto's religion or allege that abstention from pork was a religious requirement, and it did not allege intentional and arbitrary discrimination.

PROCEDURAL HISTORY

The court previously screened Soto's original complaint, found that it failed to state a claim, and granted leave to amend. Soto filed an amended complaint and moved for appointment of counsel and review of the amended complaint. On successive review, the court denied appointment of counsel, granted review, dismissed the amended complaint with prejudice under 28 U.S.C. § 1915A(b)(1), and denied further leave to amend.

DISPOSITION

dismissed

CASES CITED

- *Lassiter v. Department of Social Services*, 452 U.S. 18, 25 (1981)
- *Wilborn v. Escalderon*, 789 F.2d 1328, 1331 (9th Cir. 1986)
- *Terrell v. Brewer*, 935 F.2d 1015, 1017 (9th Cir. 1991)
- *Mallard v. U.S. District Court for the Southern District of Iowa*, 490 U.S. 296, 298 (1989)
- *Veenstra v. Idaho State Board of Correction*, Case No. 1:15-cv-00270-EJL (D. Idaho May 4, 2017)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Crumpton v. Gates*, 947 F.2d 1418, 1420 (9th Cir. 1991)
- *Hernandez v. Commissioner*, 490 U.S. 680, 699 (1989)
- *Rapier v. Harris*, 172 F.3d 999, 1006 n.4 (7th Cir. 1999)
- *Village of Willowbrook v. Olech*, 528 U.S. 562, 564 (2000) (per curiam)
- *Ivey v. Board of Regents of University of Alaska*, 673 F.2d 266, 268 (9th Cir. 1982)
- *Knapp v. Hogan*, 738 F.3d 1106, 1110 (9th Cir. 2013)

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