

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Damon Crist v. Deputy Miller; Deputy Ryan Cirilo; Deputy Padlo;
Deputy Love; Deputy Scruggs; and Deputy John Doe

Case No. 1:25-cv-00495-AKB · No. 1:25-cv-00495-AKB · Decided January 6, 2026

SUMMARY

The United States District Court for the District of Idaho screened Damon Crist’s First Amended Complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A. The court concluded that Crist failed to state plausible claims for failure to protect, equal protection, or First Amendment retaliation, but granted him 28 days to file a second amended complaint.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Amanda K. Brailsford
JURISDICTION	United States District Court for the District of Idaho
DECIDED	January 6, 2026
DOCKET	1:25-cv-00495-AKB
DISPOSITION	other
PROCEDURAL POSTURE	Initial screening of a prisoner's First Amended Complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b).
STANDARD OF REVIEW	The court screened the complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), accepting well-pleaded factual allegations as true and assessing whether they plausibly stated a claim under Federal Rule of Civil Procedure 8(a)(2) and the pleading standards of Ashcroft v. Iqbal and Bell Atlantic Corp. v. Twombly. The court liberally construed the pro se pleading but disregarded conclusory allegations and allegations lacking a sufficient factual or legal basis.
PRECEDENTIAL VALUE	unpublished
PARTIES	Damon Crist v. Deputy Miller, Deputy Ryan Cirilo, Deputy Padlo, Deputy Love, Deputy Scruggs, Deputy John Doe

TOPICS

- section 1983
- prisoners rights
- due process
- first amendment
- equal protection

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

civil procedure

QUESTIONS PRESENTED

1. Whether Crist plausibly stated a Fourteenth Amendment failure-to-protect claim against Deputy Miller and an unidentified defendant.
2. Whether Crist plausibly stated an equal-protection claim based on his delayed transfer to less restrictive housing.
3. Whether Crist plausibly stated First Amendment retaliation claims against Deputies Padlo, Love, Cirilo, and Scruggs.
4. Whether Crist should be granted leave to file a second amended complaint after the First Amended Complaint failed screening.
5. Whether Crist's motion to stay the action for 180 days should be granted.

HOLDINGS

1. Crist failed to plausibly allege that Miller or the unidentified defendant intentionally decided not to address a substantial risk of serious harm arising from other inmates' access to his criminal-discovery documents.
2. Crist failed to plausibly allege that Miller's response to his generalized fear of gang members constituted objective deliberate indifference to a substantial risk of serious harm.
3. Crist failed to state an equal-protection claim because he did not plausibly allege that the other inmates were similarly situated, that defendants acted with invidious discrimination, or that the differential treatment lacked a rational basis.
4. Crist failed to state retaliation claims against Padlo, Love, and Cirilo because he did not plausibly allege their knowledge of his protected conduct, a causal connection between that conduct and the housing decisions, or the absence of legitimate penological reasons for those decisions.
5. Crist failed to state a retaliation claim against Scruggs because the complaint did not plausibly allege that Scruggs lied about the attack video or acted because of Crist's protected conduct.
6. The court granted Crist 28 days to file a second amended complaint curing the identified deficiencies, or alternatively to file a notice of voluntary dismissal.
7. The court denied Crist's motion to stay the case for 180 days.

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.””

“Therefore, a pretrial detainee complaining of unconstitutional conditions of detention must “prove more than negligence but less than subjective intent—something akin to reckless disregard.””

“The causal nexus requirement of a retaliation claim is a “but-for” causation test.”

“Vague and conclusory allegations of official participation in civil rights violations are not sufficient to withstand a motion to dismiss or to survive screening under 28 U.S.C. §§ 1915 and 1915A.”

FACTUAL BACKGROUND

Crist was a pretrial detainee at the Ada County Jail and alleged that jail deputies retaliated against him for filing civil-rights cases and using the grievance process. He remained in a more restrictive housing unit for approximately a month and a half after two other inmates were transferred, later expressed a generalized fear of gang members and career offenders to Deputy Miller, and was attacked by another inmate after other inmates allegedly viewed criminal-discovery materials concerning him. Crist alleged that deputies failed to protect him, delayed his housing transfer, and mishandled or falsified the investigation into the attack.

PROCEDURAL HISTORY

The Clerk conditionally filed Crist's initial complaint because he was an inmate proceeding in forma pauperis. Crist then filed a First Amended Complaint at Dkt. 10, asserting failure-to-protect, equal-protection, and First Amendment retaliation claims under 42 U.S.C. § 1983. The court concluded that the First Amended Complaint failed to state a claim, denied Crist's motion to stay, and granted him 28 days to file a second amended complaint or voluntarily dismiss the action.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (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)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1067, 1071 (9th Cir. 2016) (en banc)
- Bell v. Wolfish, 441 U.S. 520, 535 (1979)
- Gordon v. County of Orange, 888 F.3d 1118, 1125 (9th Cir. 2018)
- Daniels v. Williams, 474 U.S. 327, 332 (1986)
- Farmer v. Brennan, 511 U.S. 825, 843 (1994)
- Village of Willowbrook v. Olech, 528 U.S. 562, 564 (2000)
- F.S. Royster Guano Co. v. Virginia, 253 U.S. 412, 415 (1920)
- Tigner v. Texas, 310 U.S. 141, 147 (1940)

- *More v. Farrier*, 984 F.2d 269, 271 (9th Cir. 1993)
- *McGowan v. Maryland*, 366 U.S. 420, 426 (1961)
- *City of Cleburne v. Cleburne Living Center, Inc.*, 473 U.S. 432, 440 (1985)
- *Vermouth v. Corrothers*, 827 F.2d 599, 602 (9th Cir. 1987)
- *Turner v. Safley*, 482 U.S. 78, 89 (1987)
- *Walker v. Gomez*, 370 F.3d 969, 974 (9th Cir. 2004)
- *Hernandez v. Johnston*, 833 F.2d 1316, 1318 (9th Cir. 1987)
- *Bull v. City & County of San Francisco*, 595 F.3d 964, 971 (9th Cir. 2010) (en banc)
- *Rhodes v. Robinson*, 408 F.3d 559, 567-68 (9th Cir. 2005)
- *Rizzo v. Dawson*, 778 F.2d 527, 532 & n.4 (9th Cir. 1985)
- *Wood v. Yordy*, 753 F.3d 899, 905 (9th Cir. 2014)
- *Pratt v. Rowland*, 65 F.3d 802, 806-08 (9th Cir. 1995)
- *Mendocino Environmental Center v. Mendocino County*, 192 F.3d 1283, 1300 (9th Cir. 1999)
- *Davis v. Goord*, 320 F.3d 346, 353 (2d Cir. 2003)
- *Hartman v. Moore*, 547 U.S. 250, 259-60 (2006)
- *Huskey v. City of San Jose*, 204 F.3d 893, 899 (9th Cir. 2000)
- *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 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.*, 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)