

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Jan Gawlik v. Colleen Gallagher, et al.

Gawlik v. Gallagher, No. 3:25-cv-467 (OAW) (D. Conn. June 23, 2026) · No. 3:25-cv-467 (OAW) · Decided June 23, 2026

SUMMARY

The United States District Court for the District of Connecticut conducted an initial review of Jan Gawlik’s prisoner complaint concerning alleged failure to provide reasonable accommodations for prison employment. The court allowed the plaintiff’s claims under the Americans with Disabilities Act and Rehabilitation Act to proceed against the defendants, while dismissing his retaliation, conspiracy, HIPAA, due process, harassment, and other unsupported claims. The court also addressed available relief and provided deadlines for amendment and proceeding to service.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Omar A. Williams
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	June 23, 2026
DOCKET	3:25-cv-467 (OAW)
DISPOSITION	other
PROCEDURAL POSTURE	Initial review of a pro se sentenced inmate's complaint under the Prison Litigation Reform Act, 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), the court must dismiss claims that are frivolous or malicious, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant. Pro se allegations are construed with special solicitude and interpreted to raise the strongest claims they suggest.
PRECEDENTIAL VALUE	unpublished_nonprecedential
PARTIES	Jan Gawlik v. Colleen Gallagher, et al.

TOPICS

- ada / disability
- reasonable accommodation
- prisoners rights
- civil rights
- remedies

PRACTICE AREAS

civil rights

disability discrimination

prisoner litigation

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether Gawlik plausibly alleged ADA and Rehabilitation Act claims based on the denial of reasonable accommodations for prison employment.
2. Whether Gawlik plausibly alleged First Amendment retaliation based on the denial of accommodations after he filed lawsuits against DOC staff.
3. Whether Gawlik plausibly alleged a conspiracy to violate his federally protected rights.
4. Whether the complaint stated actionable claims based on alleged HIPAA violations, violation of prison policy, harassment, or other passing statutory and constitutional references.
5. Whether official-capacity damages and declaratory relief were available, and what forms of relief could proceed.

HOLDINGS

1. The complaint plausibly alleged ADA and Rehabilitation Act claims because Gawlik sufficiently alleged that he was a qualified individual with a disability, that the defendants were subject to the statutes, and that prison officials denied him effective access to prison employment by refusing requested accommodations.
2. The retaliation claim was dismissed because, although filing lawsuits and grievances constitutes protected conduct, Gawlik alleged no facts showing that the denial of accommodations was causally connected to his lawsuits.
3. The conspiracy claim was dismissed because the complaint contained only conclusory assertions and alleged no factual basis showing a meeting of the minds or agreement among defendants to violate Gawlik's rights.
4. The claims based on HIPAA, alleged violation of prison policy, procedural due process, and verbal harassment were dismissed for failure to state a federally actionable claim.
5. The plaintiff could not pursue money damages against defendants in their official capacities or declaratory relief, but could pursue injunctive relief against defendants in their official capacities and damages against defendants in their personal capacities.

KEY QUOTATIONS

“A reasonable accommodation must provide effective access to prison activities and programs.” (at 5)

“Both grievances and lawsuits are considered protected speech” (at 6)

“It is well settled that claims of conspiracy containing only conclusory, vague, or general allegations of conspiracy to deprive a person of constitutional rights cannot withstand a motion to dismiss.” (at 7)

FACTUAL BACKGROUND

Before incarceration, Jan Gawlik sustained a serious spinal injury that left him permanently disabled, with continuing pain and limited mobility. His Connecticut Department of Correction Offender Accountability Plan recommended that he maintain a job assignment, and in early 2024 he was assigned work as a tierman. Gawlik requested accommodations because cleaning showers and mopping floors caused him back pain, but prison officials denied the request after reviewing his medical information and explaining that the duties were distributed among three inmates with opportunities to rest. Gawlik alleged that the denial violated the ADA and Rehabilitation Act and was motivated by his prior lawsuits against DOC staff.

PROCEDURAL HISTORY

Gawlik filed a complaint alleging that Connecticut Department of Correction officials failed to provide reasonable accommodations for potential prison employment and asserting retaliation, conspiracy, HIPAA, due process, harassment, and other claims. The court conducted the required initial review and permitted the ADA and Rehabilitation Act accommodation claims to proceed, while dismissing all other claims as implausible or for failure to state a claim. The court allowed amendment by August 24, 2026 and provided that the action would proceed to service if the plaintiff elected to proceed only on the surviving claims.

DISPOSITION

other

CASES CITED

- Taveras v. Semple, No. 3:15CV00531(SALM), 2023 WL 112848, at *1 n.1 (D. Conn. Jan. 5, 2023)
- Hill v. Curcione, 657 F.3d 116, 122 (2d Cir. 2011)
- Triestman v. Federal Bureau of Prisons, 470 F.3d 471, 474-75 (2d Cir. 2006)
- Wright v. New York State Department of Correction, 831 F.3d 64, 72-73 (2d Cir. 2016)
- Fulton v. Goord, 591 F.3d 37, 43 (2d Cir. 2009)
- Tsombanidis v. West Haven Fire Department, 352 F.3d 565, 573 (2d Cir. 2003)
- Hamilton v. Westchester County, 3 F.4th 86, 92 (2d Cir. 2021)
- Woolf v. Strada, 949 F.3d 89, 93 (2d Cir. 2020)
- Lenti v. Connecticut, No. 3:20-CV-127 (SRU), 2020 WL 2079462, at *3 (D. Conn. Apr. 30, 2020)
- Pennsylvania Department of Corrections v. Yeskey, 524 U.S. 206, 210 (1998)
- Henrietta D. v. Bloomberg, 331 F.3d 261, 272 (2d Cir. 2003)
- Dolan v. Connolly, 794 F.3d 290, 294-95 (2d Cir. 2015)
- Davis v. Goord, 320 F.3d 346, 352 (2d Cir. 2003)
- Gill v. Pidlypchak, 389 F.3d 379, 380 (2d Cir. 2004)
- Webb v. Goord, 340 F.3d 105, 110 (2d Cir. 2003)
- Brook v. Ruotolo, No. 23-1339, 2024 WL 3912831, at *3 (2d Cir. Aug. 23, 2024)
- Romer v. Morgenthau, 119 F. Supp. 2d 346, 363 (S.D.N.Y. 2000)
- Gallop v. Cheney, 642 F.3d 364, 369 (2d Cir. 2011)

- Gawlik v. Reis, No. 3:23-CV-1194 (OAW), 2025 WL 744270, at *2 n.5 (D. Conn. Mar. 7, 2025)
- Jordan v. Department of Correction, No. 3:24-CV-298 (VAB), 2024 WL 4581654, at *3 n.5 (D. Conn. Oct. 25, 2024)
- Youmans v. Roy, No. 3:22-CV-1650 (MPS), 2023 WL 8372825, at *6 (D. Conn. Dec. 4, 2023)
- Timm v. Faucher, No. 3:16-CV-00531 (VAB), 2017 WL 1230846, at *5 (D. Conn. Mar. 31, 2017)
- Quinones v. Quiros, No. 3:24-CV-1805 (OAW), 2025 WL 1445860, at *2 (D. Conn. May 20, 2025)
- Petion v. Pearson, No. 3:22-CV-1647 (OAW), 2023 WL 6050054, at *4 (D. Conn. Sept. 15, 2023)
- Inkel v. Connecticut, No. 3:14-CV-01303 (MPS), 2015 WL 4067038, at *4 (D. Conn. July 2, 2015)
- Murray v. Breslin, No. 13-CV-3239 (CBA) (LB), 2015 WL 502225, at *6 (E.D.N.Y. Feb. 5, 2015)

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