

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Samuel Hoffmeyer v. Summit County Jail, et al.

Hoffmeyer · No. 5:25-CV-00084 · Decided March 20, 2026

SUMMARY

The United States District Court for the Northern District of Ohio granted Defendants’ motion to dismiss Samuel Hoffmeyer’s complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court held that Summit County Jail was not a suable entity, the individual defendants were treated as sued in their official capacities and were not adequately linked to a municipal policy or custom, and the Prison Rape Elimination Act does not provide a private cause of action. The court dismissed the remaining state-law claims by declining to exercise supplemental jurisdiction.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	John R. Adams
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	March 20, 2026
DOCKET	5:25-CV-00084
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved to dismiss the complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). Plaintiff did not oppose the motion. The district court granted the motion and dismissed the action in its entirety.
STANDARD OF REVIEW	Under Rule 12(b)(1), the plaintiff bears the burden of establishing subject matter jurisdiction. A facial jurisdictional attack tests the sufficiency of the pleading and requires the court to accept the complaint's allegations as true, while a factual attack permits the court to weigh conflicting evidence without a presumption of truthfulness. Under Rule 12(b)(6), the court accepts well-pleaded factual allegations as true and construes them in the plaintiff's favor, but the complaint must state a plausible claim for relief.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Samuel Hoffmeyer v. Summit County Jail, Metamba Kaalima, Geoffrey Kugler, Jordon Larson

TOPICS

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QUESTIONS PRESENTED

1. Whether the Summit County Jail is a suable legal entity under Ohio law.
2. Whether the claims against the individual defendants, construed as official-capacity claims, stated a claim under 42 U.S.C. § 1983 absent allegations of a municipal policy or custom.
3. Whether the Prison Rape Elimination Act creates a private cause of action for an individual plaintiff.
4. Whether the court should exercise supplemental jurisdiction over the remaining state-law claims after dismissal of the federal claims.
5. Whether the plaintiff's failure to oppose the motion to dismiss constituted abandonment or waiver of opposition.

HOLDINGS

1. The Summit County Jail is not sui juris and is not a separate legal entity capable of being sued under Ohio law; the claims against it were dismissed.
2. The official-capacity claims failed because the complaint did not allege that the defendants' actions resulted from a policy or custom of the municipality.
3. The Prison Rape Elimination Act does not create a private cause of action that an individual plaintiff may bring.
4. After dismissing the federal claims before trial, the court declined to exercise supplemental jurisdiction over the remaining state-law claims and dismissed them.
5. Because Hoffmeyer did not oppose the motion to dismiss, the court deemed his claims abandoned or his opposition waived, while also independently determining that dismissal was warranted.

KEY QUOTATIONS

“municipalities incur §1983 liability only when the plaintiff’s injuries are the result of a custom or policy of the municipality.” (Section III.B)

“the PREA does not create a private cause of action which can be brought by an individual plaintiff.” (Section III.C)

“Defendants’ motion to dismiss is GRANTED. This matter is hereby DISMISSED in its entirety.” (Section IV)

FACTUAL BACKGROUND

Hoffmeyer was detained at the Summit County Jail and alleged that other inmates, including Lopane, made sexual assault threats against him. He alleged that jail personnel failed to separate him adequately from the threatening inmates and did not comply with Prison Rape Elimination Act protocols. He also alleged that he encountered an inmate who had previously sexually assaulted him and that jail personnel failed to facilitate reports concerning that inmate. His complaint additionally asserted claims concerning access to the courts and certified jail account statements.

PROCEDURAL HISTORY

Hoffmeyer filed a complaint asserting claims concerning alleged failure to protect him from sexual threats, deliberate indifference, denial of access to the courts, and denial of certified account statements. Defendants moved to dismiss for lack of subject matter jurisdiction and failure to state a claim. The court treated the claims as abandoned because Hoffmeyer did not oppose the motion, independently addressed the claims, dismissed the federal claims, declined supplemental jurisdiction over the state-law claims, and dismissed the action in its entirety.

DISPOSITION

dismissed

CASES CITED

- Cline v. United States, 13 F. Supp. 3d 868, 870 (M.D. Tenn. 2014)
- Golden v. Gorno Bros., Inc., 410 F.3d 879, 881 (6th Cir. 2005)
- Lovely v. United States, 570 F.3d 778, 781-82 (6th Cir. 2009)
- Gentek Building Products v. Sherwin-Williams Co., 491 F.3d 320, 330 (6th Cir. 2007)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Gunasekera v. Irwin, 551 F.3d 461, 466 (6th Cir. 2009)
- Gross v. Houglund, 712 F.2d 1034, 1036 (6th Cir. 1983)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Insurance Corp. of Ireland, Ltd. v. Compagnie des Bauxites de Guinee, 456 U.S. 694, 702 (1982)
- Humphrey v. U.S. AG Office, 279 F. App’x 328, 331 (6th Cir. 2008)
- Scott v. Tennessee, No. 88-6095, 878 F.2d 382, 1989 U.S. App. LEXIS 9653, at *4 (July 3, 1989)
- Adickes v. S. H. Kress & Co., 398 U.S. 144, 150 (1970)
- Harcz v. Boucher, 763 F. App’x 536, 540 (6th Cir. 2019)
- Carmichael v. City of Cleveland, 571 F. App’x 426, 435 (6th Cir. 2014)
- Gerald v. Akron Bar Assn., No. 5:18-cv-414, 2018 WL 2985142, at *2 (N.D. Ohio June 14, 2018)

- Nakia Bohanon v. Vantell, No. 1:22-cv-01161-SHM-tmp, 2025 U.S. Dist. LEXIS 76332, at *5-6 (W.D. Tenn. Apr. 22, 2025)
- Wells v. Brown, 891 F.2d 591, 593-94 (6th Cir. 1989)
- Northcott v. Plunkett, 42 F. App'x 795, 796 (6th Cir. 2002)
- Johnson, 398 F.3d at 877
- Monell v. Department of Social Services, 436 U.S. 658, 690 n.55, 691 (1978)
- Knott v. Sullivan, 418 F.3d 561, 574-75 (6th Cir. 2005)
- Fisher v. Federal Bureau of Prisons, 484 F. Supp. 3d 521, 537 (N.D. Ohio 2020)
- Simmons v. Solozano, No. 3:14CV-P354-H, 2014 U.S. Dist. LEXIS 129249, 2014 WL 4627278, at *4 (W.D. Ky. Sept. 16, 2014)
- United Mine Workers of America v. Gibbs, 383 U.S. 715, 724, 726 (1966)

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