

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

Issachar Timothy Meafou v. State of Hawaii, et al.

Meafou · No. Civil No. 25-00460 DKW-WRP · Decided March 3, 2026

SUMMARY

The United States District Court for the District of Hawaii dismissed Issachar Meafou’s First Amended Prisoner Civil Rights Complaint under 28 U.S.C. § 1915A. The court concluded that the complaint failed to plausibly state claims for excessive force, threat to safety, or inadequate medical care under the Fourteenth Amendment. The dismissal was without prejudice, and Meafou was granted leave to amend by March 31, 2026.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Hawaii                                                                                                                                                                                                                                                                                                |
| WRITING FOR THE COURT | Derrick K. Watson                                                                                                                                                                                                                                                                                                                                      |
| JURISDICTION          | United States District Court for the District of Hawaii                                                                                                                                                                                                                                                                                                |
| DECIDED               | March 3, 2026                                                                                                                                                                                                                                                                                                                                          |
| DOCKET                | Civil No. 25-00460 DKW-WRP                                                                                                                                                                                                                                                                                                                             |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | Screening of a pro se pretrial detainee's first amended prisoner civil-rights complaint under 28 U.S.C. § 1915A.                                                                                                                                                                                                                                       |
| STANDARD OF REVIEW    | Screening under 28 U.S.C. § 1915A uses the same standard as Federal Rule of Civil Procedure 12(b)(6): accepting adequately pleaded factual allegations as true, the complaint must contain sufficient factual matter to state a plausible claim for relief. Pro se pleadings are liberally construed and doubts are resolved in the plaintiff's favor. |
| PRECEDENTIAL VALUE    | Unknown; unreported district-court order                                                                                                                                                                                                                                                                                                               |
| PARTIES               | Issachar Timothy Meafou v. State of Hawaii, Levi Kaakau, Jeff Tai, Kainoa Mallot, John Doe, Pili, Larry Domingo, Lance Rabacal, Matt Huber, Chad Kahale, Villanueva                                                                                                                                                                                    |

TOPICS

- section 1983
- prisoners rights
- due process
- motions to dismiss
- civil procedure

## PRACTICE AREAS

prisoner civil rights

constitutional litigation

federal civil procedure

## QUESTIONS PRESENTED

1. Whether the first amended complaint plausibly alleged an objectively unreasonable excessive-force claim by a pretrial detainee.
2. Whether the complaint plausibly alleged that officials intentionally imposed conditions creating a substantial and objectively appreciated risk of serious harm in violation of the Fourteenth Amendment.
3. Whether the complaint plausibly alleged objectively deliberate indifference to the pretrial detainee's medical needs.
4. Whether the complaint should be dismissed under 28 U.S.C. § 1915A with leave to amend.

## HOLDINGS

1. A pretrial detainee must allege facts showing that force purposely or knowingly used against him was objectively unreasonable. Meafou's allegations concerning mace, handcuffing, and shoving did not provide sufficient factual detail to state a plausible excessive-force claim against ACO Tai.
2. Claims against officers based on their alleged failure to intervene could not proceed absent a plausible underlying constitutional violation.
3. A pretrial detainee must allege that an official intentionally decided the conditions of confinement, those conditions created a substantial risk of serious harm, the official failed to take reasonable available measures despite an objectively apparent high risk, and the failure caused injury. Meafou's allegations did not satisfy that standard.
4. A pretrial detainee asserting inadequate medical care must allege an intentional decision concerning confinement conditions, a substantial risk of serious harm, objectively unreasonable failure to take reasonable measures, and resulting injury; the conduct must amount to more than negligence but less than subjective intent. Meafou's allegations did not meet that standard.
5. The first amended complaint was dismissed with leave to amend because the identified pleading deficiencies might be curable by amendment.

## KEY QUOTATIONS

*“Under this standard, a complaint must “contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face.”” (Section II)*

*“the appropriate standard for a pretrial detainee’s excessive force claim is solely an objective one.” (Section III.B)*

*“A pretrial detainee who asserts a threat-to-safety claim must “prove more than negligence but less than subjective intent—something akin to reckless disregard.”” (Section III.C)*

*“The Court DISMISSES the FAC, ECF No. 11, with leave to amend.” (Section VI)*

## FACTUAL BACKGROUND

While detained at the Oahu Community Correctional Center, Meafou was housed with another inmate who allegedly attacked and stabbed him. During the response, an officer allegedly pointed mace at Meafou, handcuffed him in a manner that restricted circulation, and shoved him toward the medical unit while other officers watched. Meafou alleged that a nurse provided limited treatment and that prison officials made housing decisions and failed to protect him from threats. The court concluded that the amended complaint lacked facts showing objectively unreasonable force, a substantial and objectively appreciated risk to his safety, or objectively deliberately indifferent medical care.

## PROCEDURAL HISTORY

Meafou filed the action alleging excessive force, threats to his safety, and inadequate medical care under 42 U.S.C. § 1983. The court dismissed the original complaint on December 23, 2025. After receiving the first amended complaint and a clarifying letter, the court screened the amended pleading and dismissed it for failure to state plausible claims, granting leave to amend by March 31, 2026.

## DISPOSITION

dismissed

## CASES CITED

- Nordstrom v. Ryan, 762 F.3d 903, 906 (9th Cir. 2014)
- DePaepe v. White, 2020 WL 3472907, at \*2 n.3 (D. Haw. June 24, 2020)
- Byrd v. Phx. Police Dep't, 885 F.3d 639, 641 (9th Cir. 2018)
- Lopez v. Smith, 203 F.3d 1122, 1126-27, 1130 (9th Cir. 2000) (en banc)
- Rhodes v. Robinson, 621 F.3d 1002, 1004 (9th Cir. 2010)
- Rosati v. Igbino, 791 F.3d 1037, 1039 (9th Cir. 2015) (per curiam)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Hebbe v. Pliler, 627 F.3d 338, 342 (9th Cir. 2010)
- Sylvia Landfield Trust v. City of Los Angeles, 729 F.3d 1189, 1196 (9th Cir. 2013)
- Cornel v. Hawaii, 37 F.4th 527, 531 (9th Cir. 2022)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Park v. City & County of Honolulu, 952 F.3d 1136, 1140 (9th Cir. 2020)
- Kingsley v. Hendrickson, 576 U.S. 389, 396-97 (2015)
- Brown v. Baudino, 840 F. App'x 263, 263 (9th Cir. 2021)
- Shaw v. City of Redondo Beach, 2005 WL 6117549, at \*8 (C.D. Cal. Aug. 23, 2005)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Claiborne v. Blauser, No. 2:10-cv-2427 LKK EFB P, 2013 WL 1384995, at \*5 (E.D. Cal. Apr. 4, 2013)
- Castro v. County of Los Angeles, 833 F.3d 1060, 1071 (9th Cir. 2016) (en banc)
- Gordon v. County of Orange, 888 F.3d 1118, 1124-25 (9th Cir. 2018)

- Breaux v. Med. Staff, 2024 WL 5706269, at \*3 (E.D. Cal. Jan. 12, 2024)
- Dampier v. King Cnty. Jail, 2022 WL 17655879, at \*2 (W.D. Wash. Nov. 17, 2022)
- Ramirez v. County of San Bernardino, 806 F.3d 1002, 1008 (9th Cir. 2015)
- Lacey v. Maricopa County, 693 F.3d 896, 928 (9th Cir. 2012)

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