

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

James Catignani v. Chad Youker

Catignani · No. 3:26-cv-00436 · Decided May 26, 2026

SUMMARY

The court grants James Catignani leave to proceed in forma pauperis and assesses the full civil filing fee under the Prison Litigation Reform Act. On screening, the court permits First Amendment, RLUIPA, and Tennessee state-law claims concerning the removal or restriction of religious materials at the Williamson County Jail to proceed against Captain Chad Youker, while dismissing claims under the Federal Tort Claims Act, Spending Clause, and Commerce Clause. The court directs service of process and refers the action for further proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	May 26, 2026
DOCKET	3:26-cv-00436
DISPOSITION	other
PROCEDURAL POSTURE	A pro se pretrial detainee filed an action under 42 U.S.C. § 1983, RLUIPA, Tennessee Code Annotated § 41-21-211, the Federal Tort Claims Act, the Spending Clause, and the Commerce Clause. The district court granted leave to proceed in forma pauperis and screened the complaint under the PLRA.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court must dismiss claims that are frivolous, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant. On initial screening, the court liberally construes a pro se complaint and accepts credible factual allegations as true.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; nonprecedential

PARTIES

James Catignani v. Chad Youker

TOPICS

prisoners rights

free exercise clause

section 1983

civil procedure

federal spending

PRACTICE AREAS

Prisoners' rights

Civil rights

Religious liberty

Federal civil procedure

QUESTIONS PRESENTED

1. Whether Catignani adequately stated First Amendment free-exercise and RLUIPA claims based on alleged restrictions on access to Bibles and other religious materials.
2. Whether the First Amendment, Tennessee state-law, and RLUIPA claims could proceed against Captain Youker in his official and individual capacities.
3. Whether the Federal Tort Claims Act claims stated a claim against Captain Youker, a county employee.
4. Whether the complaint stated independent claims under the Spending Clause or Commerce Clause.
5. Whether Catignani should be granted leave to proceed in forma pauperis and assessed the full PLRA filing fee.

HOLDINGS

1. Because Catignani lacked sufficient financial resources to pay the filing fee in advance, the court granted his application to proceed in forma pauperis, while assessing the full \$350 civil filing fee for payment through the PLRA installment process.
2. The complaint stated a viable First Amendment free-exercise claim because its allegations permitted an inference that Catignani sincerely held a religious belief in reading and studying the Bible and that the alleged jail restrictions substantially or improperly burdened that practice.
3. The complaint stated a viable RLUIPA claim for prospective or official-capacity relief based on allegations that jail policies substantially burdened sincerely held religious exercise, but an individual-capacity RLUIPA claim for money damages was dismissed.
4. The complaint stated a claim under Tennessee Code Annotated § 41-21-211 because its allegations permitted an inference that Williamson County Jail policies denied Catignani access to a Bible during nonworking hours.
5. The § 1983 and Tennessee state-law claims could proceed against Captain Youker in both his official and individual capacities; the official-capacity claim was functionally a claim against Williamson County.
6. The Federal Tort Claims Act claims failed to state a claim because Catignani sued a county employee rather than the United States.
7. Any independent claims under the Spending Clause or Commerce Clause were dismissed because the complaint did not explain the legal or factual basis for such claims.

KEY QUOTATIONS

“The allegations presently before the court permit Plaintiff’s Section 1983 and RLUIPA claims to proceed for further development of the record.” (II. Prison Litigation Reform Act Screening)

“Having screened the Complaint pursuant to the PLRA, the court finds that it states viable claims under the First Amendment, RLUIPA, and Tennessee state law.” (III. Conclusion)

FACTUAL BACKGROUND

James Catignani, a pretrial detainee at the Williamson County Jail, alleged that Captain Chad Youker seized religious books and that jail policies restricted possession of physical Bibles and Alcoholics Anonymous materials. He alleged that the restrictions impaired his spiritual well-being, prevented him from practicing his religion, caused him to miss Easter, and punished him for religious practice. He also alleged that the restrictions resulted from official Williamson County Jail policies.

PROCEDURAL HISTORY

Catignani filed a complaint alleging that officials at the Williamson County Jail removed or restricted access to religious materials, including Bibles and Alcoholics Anonymous materials. The court granted his application to proceed in forma pauperis, assessed the full filing fee under the PLRA, and conducted initial screening. The court allowed the First Amendment, RLUIPA, and Tennessee state-law claims to proceed in specified capacities, dismissed the Federal Tort Claims Act, Spending Clause, and Commerce Clause claims, and referred the action for further proceedings.

DISPOSITION

other

CASES CITED

- United States v. Smotherman, 838 F.3d 736, 739 (6th Cir. 2016)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Thomas v. Eby, 481 F.3d 434, 437 (6th Cir. 2007)
- Denton v. Hernandez, 504 U.S. 25, 33 (1992)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991)
- McDonald v. Hall, 610 F.2d 16, 19 (1st Cir. 1979)
- Dominguez v. Corr. Med. Servs., 555 F.3d 543, 549 (6th Cir. 2009)
- Sigley v. City of Panama Heights, 437 F.3d 527, 533 (6th Cir. 2006)
- Maye v. Klee, 915 F.3d 1076, 1083 (6th Cir. 2019)
- Kent v. Johnson, 821 F.2d 1220, 1224 (6th Cir. 1987)
- O’Lone v. Estate of Shabazz, 482 U.S. 342, 349 (1987)

- *Cavin v. Michigan Department of Corrections*, *Cavin v. Mich. Dep't of Corr.*, 927 F.3d 455, 458, 461 (6th Cir. 2019)
- *Turner v. Safley*, 482 U.S. 78, 89-91 (1987)
- *Brown v. Page*, No. 2:20-cv-00070, 2021 WL 288754, at *3 (M.D. Tenn. Jan. 27, 2021)
- *Yates v. Painter*, 306 F. App'x 778, 780 (3d Cir. 2009)
- *Washington v. Klem*, 497 F.3d 272, 282-83 (3d Cir. 2007)
- *Colvin v. Caruso*, 605 F.3d 282, 296 (6th Cir. 2010)
- *Holt v. Hobbs*, 574 U.S. 352, 361 (2015)
- *Alkire v. Irving*, 330 F.3d 802, 810 (6th Cir. 2003)
- *Haight v. Thompson*, 763 F.3d 554, 569-70 (6th Cir. 2014)
- *Berkovitz by Berkovitz v. United States*, 486 U.S. 531, 535 (1988)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-middle-district-of-tennessee-nashville-division-united-states-d/2026/james-catignani-v-chad-youker-w4c3qeam>