

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Marquan D. Williams v. Albemarle Charlottesville Regional Jail

Williams v. Albemarle Charlottesville Regional Jail · No. 7:25-cv-00687 · Decided January 5, 2026

SUMMARY

The United States District Court for the Western District of Virginia dismissed Marquan D. Williams’s 42 U.S.C. § 1983 action against the Albemarle Charlottesville Regional Jail. The court held that the jail is not a “person” subject to suit under § 1983 and dismissed the action for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii), after Williams failed to file an amended complaint naming a proper defendant.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Thomas T. Cullen
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	January 5, 2026
DOCKET	7:25-cv-00687
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought an action under 42 U.S.C. § 1983. After the court advised him that the jail was not a proper defendant and directed him to amend, he failed to file an amended complaint. The court dismissed the action for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii).
STANDARD OF REVIEW	The court reviewed the operative complaint for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii).
PRECEDENTIAL VALUE	unknown
PARTIES	Marquan D. Williams v. Albemarle Charlottesville Regional Jail

TOPICS

- section 1983
- prisoners rights
- eleventh amendment immunity
- motions to dismiss
- civil procedure

PRACTICE AREAS

civil rights

prisoner civil rights

federal civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the Albemarle Charlottesville Regional Jail is a person subject to suit under 42 U.S.C. § 1983.
2. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2)(B)(ii) after the plaintiff failed to amend as ordered.
3. Whether the jail is entitled to Eleventh Amendment immunity as an arm of the Commonwealth of Virginia.

HOLDINGS

1. A jail is not a person subject to suit under 42 U.S.C. § 1983.
2. The action must be dismissed for failure to state a claim because the operative complaint names only a non-suable jail as defendant and plaintiff failed to amend after being given an opportunity and warning.
3. The jail is an arm of the Commonwealth of Virginia entitled to Eleventh Amendment immunity.

KEY QUOTATIONS

“The Jail is not a ‘person’ for purposes of § 1983, and is an arm of the Commonwealth of Virginia entitled to Eleventh Amendment immunity.”

“Accordingly, the court will grant Plaintiff’s request to proceed in forma pauperis and dismiss this case for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii).”

FACTUAL BACKGROUND

Williams filed a § 1983 complaint against the Albemarle Charlottesville Regional Jail. The court advised him that a jail is not a person subject to suit under § 1983 and directed him to amend the complaint to name an appropriate person defendant. Williams did not amend within the 30-day period.

PROCEDURAL HISTORY

Williams filed the complaint on September 26, 2025, naming the Albemarle Charlottesville Regional Jail as the defendant. The court conditionally filed the complaint, then ordered Williams to file an amended complaint naming a proper person defendant and describing the alleged constitutional violations. After more than 30 days elapsed without an amended complaint, the court reviewed the original complaint and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- *Perdue v. Penalosa*, No. 93-6313, 1994 WL 559140, at *1 (4th Cir. Oct. 13, 1994)

- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)

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