

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

Eric Ericson v. Sheriffs of Somerset County Jail, et al.

No. 1:25-cv-00381-SDN (D. Me. Jan. 7, 2026) (recommended decision) · No. 1:25-cv-00381-SDN · Decided January 7, 2026

SUMMARY

A U.S. Magistrate Judge recommends dismissal of a pro se pretrial detainee’s complaint under 28 U.S.C. § 1915(e)(2), unless the plaintiff amends within 14 days. The recommended decision concludes that the complaint lacks individualized allegations identifying each defendant’s conduct and relies on insufficiently specific and conclusory assertions concerning disability discrimination, mistreatment, assault, and solitary confinement. It also rejects supervisory-liability claims against the sheriffs based on the absence of allegations of their personal involvement.

CASE DETAILS

COURT	United States District Court for the District of Maine
WRITING FOR THE COURT	John C. Nivison
JURISDICTION	United States District Court for the District of Maine
DECIDED	January 7, 2026
DOCKET	1:25-cv-00381-SDN
DISPOSITION	other
PROCEDURAL POSTURE	A pro se pretrial detainee filed a civil-rights complaint and sought leave to proceed without prepayment of fees. After granting the application and permitting amendment, the magistrate judge conducted the required preliminary screening and issued a recommended decision proposing dismissal unless the complaint was amended within fourteen days.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis action that is frivolous, malicious, or fails to state a claim. In assessing failure to state a claim, the court assumes the truth of well-pleaded facts, draws reasonable inferences for the plaintiff, and asks whether the complaint pleads enough facts to state a plausible claim for relief.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

civil procedure

pleadings

motions to dismiss

section 1983

ada / disability

PRACTICE AREAS

civil rights

civil procedure

prisoner civil rights

disability discrimination

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible claim against the named defendants when it failed to identify each defendant's alleged unlawful conduct.
2. Whether the complaint stated actionable claims when its allegations were conclusory and lacked factual detail concerning who, what, when, where, and how.
3. Whether the complaint could impose supervisory liability on sheriffs named by title without allegations of their own individual actions.

HOLDINGS

1. A complaint must allege facts supporting an individualized finding that each defendant, through that defendant's own actions, violated the plaintiff's rights; conclusory allegations that all defendants were responsible do not state a plausible claim.
2. Labels, conclusions, formulaic recitations of elements, and allegations that are too meager, vague, or conclusory to make relief plausible do not satisfy federal pleading requirements.
3. Vicarious liability does not apply to the asserted civil-rights claims, and a plaintiff must allege that each supervisory official, through the official's own individual actions, violated the Constitution.

KEY QUOTATIONS

"A complaint fails to state a claim upon which relief can be granted if it does not plead "enough facts to state a claim to relief that is plausible on its face.""

"To state a plausible claim for relief against each individual defendant, the allegations, if true, must support a finding that the individual, through his or her individual actions, violated Plaintiff's rights."

"A pleading that offers labels and conclusions or a formulaic recitation of the elements of a cause of action will not do."

FACTUAL BACKGROUND

Plaintiff alleged that, while a pretrial detainee in multiple jails and during transport, he was denied constitutional rights, denied accommodations for disabilities, mistreated because of disabilities, assaulted, and held in solitary confinement for an unreasonable period. He sought punishment of those responsible and monetary damages. The complaint generally attributed the conduct to the defendants without identifying the individual conduct of particular defendants or supplying detailed factual allegations.

PROCEDURAL HISTORY

Plaintiff filed his complaint and an application to proceed in forma pauperis. The Court granted the application and later granted Plaintiff's motion to amend to add a defendant. Following screening under 28 U.S.C. § 1915(e) (2), the magistrate judge recommended dismissal unless Plaintiff timely amended to cure deficiencies, subject to objections and de novo review by the district court under 28 U.S.C. § 636(b)(1)(B).

DISPOSITION

other

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 324 (1989)
- Ocasio-Hernandez v. Fortuno-Burset, 640 F.3d 1, 12 (1st Cir. 2011)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Rodríguez-Reyes v. Molina-Rodríguez, 711 F.3d 49, 55 (1st Cir. 2013)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Young v. Wells Fargo, N.A., 717 F.3d 224, 231 (1st Cir. 2013)
- Ferranti v. Moran, 618 F.2d 888, 890 (1st Cir. 1980)
- Ashcroft v. Iqbal, 556 U.S. 662, 676-77 (2009)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Ashcroft v. Iqbal, 556 U.S. 662, 680 (2009)
- Byrne v. Maryland, No. 1:20-cv-00036-GZS, 2020 WL 1317731, at *5 (D. Me. Mar. 20, 2020)
- S.E.C. v. Tambone, 597 F.3d 436, 442 (1st Cir. 2010)
- Maldonado v. Fontanes, 568 F.3d 263, 274-75 (1st Cir. 2009)

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