

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Steven Lane v. St. Joseph Superior Court, Stephaine Rahl, and
Jeffrey Sanford

Lane · No. 3:25cv905 DRL-SJF · Decided April 24, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Steven Lane’s prisoner civil-rights complaint under 28 U.S.C. § 1915A. The court held that the St. Joseph Superior Court was protected by Eleventh Amendment immunity, the deputy prosecutor by prosecutorial immunity, and the judge by judicial immunity, and therefore denied leave to amend as futile.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Damon R. Leichty
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	April 24, 2026
DOCKET	3:25cv905 DRL-SJF
DISPOSITION	dismissed
PROCEDURAL POSTURE	A prisoner proceeding pro se brought a 42 U.S.C. § 1983 action seeking monetary damages against a state court, a deputy prosecutor, and a state court judge. The district court screened the complaint under 28 U.S.C. § 1915A and dismissed it without permitting amendment.
STANDARD OF REVIEW	Mandatory screening under 28 U.S.C. § 1915A; the complaint must be dismissed if it is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant.
PRECEDENTIAL VALUE	Unpublished federal district court opinion; precedential status is unknown from the source.
PARTIES	Steven Lane v. St. Joseph Superior Court, Stephaine Rahl, Jeffrey Sanford

TOPICS

prisoners rights

section 1983

sovereign immunity

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

constitutional immunity

QUESTIONS PRESENTED

1. Whether the St. Joseph Superior Court was immune from Lane's § 1983 damages action under the Eleventh Amendment.
2. Whether Deputy Prosecutor Stephaine Rahl was protected by absolute prosecutorial immunity for initiating and presenting the prosecution.
3. Whether Judge Jeffrey Sanford was protected by absolute judicial immunity for presiding over Lane's criminal case.
4. Whether Lane should be permitted to amend his complaint.
5. Whether the complaint should be dismissed under 28 U.S.C. § 1915A.

HOLDINGS

1. The St. Joseph Superior Court has sovereign immunity and is immune from Lane's suit for monetary relief.
2. Deputy Prosecutor Stephaine Rahl is protected by absolute prosecutorial immunity for prosecuting Lane for the charged offenses, even though Lane alleged that he was prosecuted for crimes not identified during his arrest.
3. Judge Jeffrey Sanford is protected by absolute judicial immunity for presiding over Lane's criminal case.
4. Leave to amend was properly denied because any amendment would be futile when all defendants are immune from the requested relief.

KEY QUOTATIONS

“Under 28 U.S.C. § 1915A, the court still must review the merits of a prisoner complaint and dismiss it if the action is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief against an immune defendant.”

“Absolute immunity shields prosecutors even if they act maliciously, unreasonably, without probable cause, or even on the basis of false testimony or evidence.”

“A judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in the clear absence of all jurisdiction.”

“There is no basis for allowing Mr. Lane to file an amended complaint.”

FACTUAL BACKGROUND

Steven Lane, a prisoner, alleged that he was prosecuted for crimes with which he was not charged during his arrest. He sought monetary compensation from the St. Joseph Superior Court, Deputy Prosecutor Stephaine Rahl, and Judge Jeffrey Sanford based on that prosecution. The court relied on the defendants' status as a state court, prosecutor, and judge in determining that each was immune from the requested suit.

PROCEDURAL HISTORY

Lane filed a pro se complaint alleging that he was prosecuted for crimes with which he was not charged during his arrest. On screening, the court determined that the state court was protected by Eleventh Amendment immunity, the deputy prosecutor by prosecutorial immunity, and the judge by judicial immunity. The court also concluded that amendment would be futile and dismissed the action under § 1915A.

DISPOSITION

dismissed

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Wynn v. Southward, 251 F.3d 588, 592 (7th Cir. 2001)
- MCI Telecommunications Corp. v. Ill. Commerce Comm'n, 183 F.3d 558, 563 (7th Cir. 1999)
- Imbler v. Pachtman, 424 U.S. 409, 431 (1976)
- Smith v. Power, 346 F.3d 740, 742 (7th Cir. 2003)
- Polzin v. Gage, 636 F.3d 834, 838 (7th Cir. 2011)
- Stump v. Sparkman, 435 U.S. 349, 359 (1978)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Russell v. Zimmer, Inc., 82 F.4th 564, 572 (7th Cir. 2023)
- Holmes v. Marion Cnty. Sheriff's Off., 141 F.4th 818, 822-24 (7th Cir. 2025)

OPINION

Lane

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA

SOUTH BEND DIVISION

STEVEN LANE,

Plaintiff, v. CAUSE NO. 3:25cv905 DRL-SJF

ST. JOSEPH SUPERIOR COURT,

STEPHAINE RAHL, and JEFFREY

SANFORD,

Defendants.

OPINION AND ORDER

Steven Lane, a prisoner without a lawyer, filed a complaint seeking monetary compensation from a state court, a state deputy prosecutor, and a state court judge because he was prosecuted for crimes with which he was not charged during his arrest. ECF 1. “A document filed pro se is to be liberally construed, and a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (quotations and citations omitted). Under 28 U.S.C. § 1915A, the court still must review the merits of a prisoner complaint and dismiss it if the action is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief against an immune defendant. Here, all three of these defendants are immune from suit. The St. Joseph Superior Court has Eleventh Amendment immunity, which generally precludes a citizen from suing a State or one of its agencies or departments in federal court. *Wynn v. Southward*, 251 F.3d 588, 592 (7th Cir. 2001). There are three exceptions to Eleventh Amendment immunity: (1) suits directly against the State based on a cause of action where Congress has abrogated the state’s immunity from suit; (2) suits directly against the State if the State waived its sovereign immunity; and (3) suits against a state official seeking prospective equitable relief for ongoing violations of federal law. *MCI Telecommunications Corp. v. Ill. Commerce Comm’n*, 183 F.3d 558, 563 (7th Cir. 1999). None of these exceptions apply here. The St. Joseph Superior Court has sovereign immunity and must be dismissed. Deputy Prosecutor Stephanie Rahl has prosecutorial immunity because “in initiating a prosecution and in presenting the State’s case, the prosecutor is immune from a civil suit for damages under § 1983.” *Imbler v. Pachtman*, 424 U.S. 409, 431 (1976). “Absolute immunity shields prosecutors even if they act maliciously, unreasonably, without probable cause, or even on the basis of false testimony or evidence.” *Smith v. Power*, 346 F.3d 740, 742 (7th Cir. 2003) (quotations and citation omitted). Deputy Prosecutor Stephanie Rahl has prosecutorial immunity for prosecuting Mr. Lane for crimes he was not charged with during his arrest. Judge Jeffrey Sanford has judicial immunity because a “judge has absolute immunity for any judicial actions unless the judge acted in absence of all jurisdiction.” *Polzin v. Gage*, 636 F.3d 834, 838 (7th Cir. 2011). “A judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in the clear absence of all jurisdiction.” *Stump v. Sparkman*, 435 U.S. 349, 359 (1978). Judge Jeffrey Sanford has judicial immunity for presiding over Mr. Lane’s criminal case for crimes he was not charged with during his arrest. “The usual standard in civil cases is to allow defective pleadings to be corrected, especially in early stages, at least where amendment would not be futile.” *Abu-Shawish v. United States*, 898 F.3d 726, 738 (7th Cir. 2018). “District courts, however, have broad discretion to deny leave to amend a complaint where the amendment would be futile.” *Russell v. Zimmer, Inc.*, 82 F.4th 564, 572 (7th Cir. 2023). Suing immune defendants fails to state a claim and is legally frivolous. See *Holmes v. Marion Cnty. Sheriff’s Off.*, 141 F.4th 818, 822-24 (7th Cir. 2025). There is no basis for allowing Mr. Lane to file an amended complaint.

For these reasons, this case is DISMISSED under 28 U.S.C. § 1915A. SO ORDERED. April 24, 2026 s/ Damon R. Leichty Judge, United States District Court

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