

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, FORT WAYNE DIVISION

Parris Jordan v. Ray, Butler, Allen County

Cause No. 1:25-CV-517-JD-AZ · No. 1:25-CV-517-JD-AZ · Decided January 14, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviewed Parris Jordan’s prisoner complaint under 28 U.S.C. § 1915A. The court held that the allegations concerning sleeping on a mat on the jail floor did not state an objectively unreasonable conditions-of-confinement claim and that the complaint did not adequately allege personal involvement by the individual defendants or a municipal policy, practice, or custom by Allen County. The court granted Jordan until February 17, 2026, to file an amended complaint and cautioned that the action would otherwise be dismissed.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Jon E. DeGuilio
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	January 14, 2026
DOCKET	1:25-CV-517-JD-AZ
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se pretrial detainee's prisoner civil-rights complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must review a prisoner complaint and dismiss it if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court opinion

TOPICS

- section 1983
- prisoners rights
- due process
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Jordan's allegations that he was required to sleep on a mat on the jail floor stated a constitutional conditions-of-confinement claim.
2. Whether Commander Ray could be held liable under 42 U.S.C. § 1983 based solely on his supervisory or classification responsibilities.
3. Whether Chief Butler could be sued when he was not mentioned in the complaint and no personal involvement was alleged.
4. Whether Allen County could be held liable absent allegations that a county policy, practice, or custom caused the alleged constitutional violation.
5. Whether Jordan should be permitted to amend the complaint after the screening dismissal.

HOLDINGS

1. The complaint did not state a constitutional claim because Jordan's allegation that he slept on a mat on the floor, rather than an elevated bed, did not plausibly allege an objectively serious or objectively unreasonable deprivation.
2. The complaint did not plausibly allege that any defendant acted purposely, knowingly, or recklessly, or that the response to the alleged sleeping condition was objectively unreasonable.
3. Commander Ray could not be held liable merely because he supervised the jail or controlled classification; the complaint needed to allege his personal involvement in the decisions concerning where Jordan slept.
4. Jordan could not proceed against Chief Butler because the complaint did not mention Butler in its factual allegations or allege that he was personally involved in the challenged events.
5. The complaint did not state a claim against Allen County because it did not allege that a county policy, practice, or custom caused a constitutional violation.
6. Jordan was granted leave to file an amended complaint by February 17, 2026, because amendment at this early stage might not be futile.

KEY QUOTATIONS

“sleeping on a mat on the floor, while uncomfortable, does not deprive a person of the minimal civilized measure of life’s necessities.”

“public employees are responsible for their own misdeeds but not for anyone else’s.”

FACTUAL BACKGROUND

Jordan alleged that he was required to sleep on the concrete floor of the Allen County Jail from August 5 through August 10, 2025, and again from August 27 through August 28, 2025, including near a toilet in at least one location. He had a blanket and a mat, and alleged that a requested plastic sleeping shell was not provided for

three days. He sued Jail Commander Ray, Chief Butler, and Allen County based on the sleeping arrangements and supervisory responsibility.

PROCEDURAL HISTORY

Parris Jordan, a prisoner proceeding without counsel, filed a complaint under 42 U.S.C. § 1983 concerning sleeping conditions at the Allen County Jail and named Commander Ray, Chief Butler, and Allen County as defendants. The court screened the complaint, concluded that it failed to state a claim, and granted Jordan until February 17, 2026, to file an amended complaint, cautioning that the case would be dismissed if he did not respond.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Moore v. Childs, No. 1:24-CV-333-HAB-SLC, 2024 WL 4380455, at *3 (N.D. Ind. Oct. 3, 2024)
- Moore v. Byrd, No. 24-3006, 2025 WL 2779297 (7th Cir. Sept. 30, 2025)
- Moore v. Byrd, No. 24-3006, 2025 WL 3099873 (7th Cir. Nov. 5, 2025)
- Miranda v. County of Lake, 900 F.3d 335, 352 (7th Cir. 2018)
- Kingsley v. Hendrickson, 576 U.S. 389, 398 (2015)
- Hardeman v. Curran, 933 F.3d 816, 820, 823 (7th Cir. 2019)
- Smith v. Dart, 803 F.3d 304, 309 (7th Cir. 2015)
- Bell v. Wolfish, 441 U.S. 520, 539 n.21 (1979)
- Ingraham v. Wright, 430 U.S. 651, 674 (1977)
- Mays v. Emanuele, 853 F. App'x 25, 26-27 (7th Cir. 2021)
- Randle v. Gladieux, No. 1-21-CV-425-HAB-SLC, 2022 U.S. Dist. LEXIS 26855, at *3-*4 (N.D. Ind. Feb. 15, 2022)
- Rodmaker v. Krienhop, No. 4:14-CV-070-TWP-TAB, 2014 U.S. Dist. LEXIS 100067, at *6 (S.D. Ind. July 23, 2014)
- Roop v. Squadrito, 70 F. Supp. 2d 868, 874 (N.D. Ind. 1999)
- Thomas v. Squadrito, 98-CV-240, slip op. at 12 (N.D. Ind. Aug. 6, 1999)
- Burks v. Raemisch, 555 F.3d 592, 594, 596 (7th Cir. 2009)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA FORT WAYNE
DIVISION PARRIS JORDAN, Plaintiff, v. CAUSE NO. 1:25-CV-517-JD-AZ RAY, BUTLER,

ALLEN COUNTY, Defendants. OPINION AND ORDER Parris Jordan, a prisoner without a lawyer, filed a complaint. 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) (quotation marks and citations omitted).

Nevertheless, under 28 U.S.C. § 1915A, the court 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 a defendant who is immune from such relief. Jordan alleges that, from August 5, 2025, through August 10, 2025, he had to sleep on the concrete floor at the Allen County Jail.

He sent a request to get a “boat” on August 7, 2025, but it took three more days before a “boat” was provided.¹ He was 1 Jordan does not explain what a boat is, but it appears to be a reference to a plastic shell used as a bed. See *Moore v. Childs*, No. 1:24-CV-333-HAB-SLC, 2024 WL 4380455, at *3 (N.D. Ind. Oct. 3, 2024), appeal dismissed as moot sub nom. *Moore v. Byrd*, No. 24-3006, 2025 WL 2779297 (7th Cir.

Sept. 30, 2025), reh'g denied, No. 24-3006, 2025 WL 3099873 (7th Cir. Nov. 5, 2025). again required to sleep on the floor when he moved to a different housing unit on August 27, 2025, through August 28, 2025. In at least one of these locations, he was required to sleep near a toilet. He had both a blanket and a mat.

As a pre-trial detainee, Jordan's rights arise under the Fourteenth Amendment. *Miranda v. Cnty. of Lake*, 900 F.3d 335, 352 (7th Cir. 2018) (citing *Kingsley v. Hendrickson*, 576 U.S. 389 (2015)). The Fourteenth Amendment guarantees inmates “the minimal civilized measure of life's necessities,” which includes “reasonably adequate ventilation, sanitation, bedding, hygienic materials, and utilities.” *Hardeman v. Curran*, 933 F.3d 816, 820 (7th Cir.

2019) (quotation marks omitted). The challenged condition must result in a deprivation that is “objectively serious enough to amount to a constitutional deprivation.” *Smith v. Dart*, 803 F.3d 304, 309 (7th Cir. 2015); see also *Bell v. Wolfish*, 441 U.S. 520, 539 n.21 (1979) (quoting *Ingraham v. Wright*, 430 U.S. 651, 674 (1977)) (“There is, of course, a de minimis level of imposition with which the Constitution is not concerned.”).

Then, to state a claim for damages against an individual defendant, the plaintiff must allege the defendant's “response was objectively unreasonable under the circumstances; and that [the defendant] acted purposely, knowingly, or recklessly with respect to the consequences of [his] actions.” *Mays v. Emanuele*, 853 F. App'x 25, 26-27 (7th Cir. 2021) (citing *Hardeman*, 933 F.3d at 823 and *Miranda*, 900 F.3d at 353-54). “A jail official's response to serious conditions of confinement is objectively unreasonable when it is ‘not rationally related to a legitimate

nonpunitive governmental purpose’ or is ‘excessive in relation to that purpose.’” Id. at 27 (quoting *Kingsley*, 576 U.S. at 398).

The allegations in Jordan’s complaint do not suggest that sleeping on the floor amounted to an objectively unreasonable condition. He admits that he had a mat, and sleeping on a mat on the floor, rather than on an elevated bed, does not, by itself, constitute a constitutional violation. See *Randle v. Gladieux*, No. 1-21-CV-425-HAB-SLC, 2022 U.S. Dist. LEXIS 26855 at *3-4 (N.D.

Ind. Feb 15, 2022) (“[S]leeping on a mat on the floor, while uncomfortable, does not deprive a person of the minimal civilized measure of life’s necessities.”); *Rodmaker v. Krienhop*, No. 4:14-CV-070-TWP-TAB, 2014 U.S. Dist. LEXIS 100067 at *6 (S.D. Ind. July 23, 2014) (“[S]leeping on the floor does not punish a detainee so long as jail officials provide a mattress.”).

To the extent that Jordan is claiming that the mat was deficient, he has not alleged that his mat was different from the mats used by the inmates on elevated beds. Nor does he explain how the elevated beds provided a better sleeping surface than the floor. See *Roop v. Squadrito*, 70 F. Supp. 2d 868, 874 (N.D. Ind. 1999) (noting “the bunk the Plaintiff aspired to in the Allen County Jail is nothing more than a suspended steel platform, and this can hardly be characterized as any great improvement over a concrete floor” (quoting *Thomas v. Squadrito*, 98–CV–240, slip op. p. 12 (N.D.

Ind. August 6, 1999)). Furthermore, Jordan is suing Jail Commander Ray because he runs the Allen County Jail and Jordan believes Commander Ray should be held responsible for his staff’s actions. He also asserts that Commander Ray runs classification and is therefore responsible for inmate bed arrangements. There is no general respondeat superior liability under 42 U.S.C. § 1983.

Burks v. Raemisch, 555 F.3d 592, 594 (7th Cir. 2009). “[P]ublic employees are responsible for their own misdeeds but not for anyone else’s.” Id. at 596. Commander Ray cannot be held liable merely because he is a supervisor or because he is in charge of classification. Jordan’s complaint does not allege that Commander Ray was personally involved in making decisions regarding where Jordan slept.

Jordan also named Chief Butler as a defendant, but he does not mention Chief Butler in the body of the complaint. Because Jordan does not allege that Chief Butler was personally involved in the events he complains about, he cannot proceed against him.

Finally, Jordan named Allen County as a defendant. Allen County can only be held liable if the plaintiff’s constitutional rights were violated due to its policies, practices, or customs, and the complaint does not allege that any policy, practice, or custom of Allen County caused Jordan’s constitutional rights to be violated. See *Monell v. Dep’t of Soc. Servs. of City of New York*, 436 U.S. 658 (1978).

This complaint does not state a claim for which relief can be granted. If Jordan believes he can state a claim based on (and consistent with) the events described in this complaint, he may file an amended complaint because “[t]he 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). To file an amended complaint, he needs to write this cause number on a Pro Se 14 (INND Rev. 2/20) Prisoner Complaint form which is available from his law library. He needs to write the word “Amended” on the first page above the title “Prisoner Complaint” and send it to the court after he properly completes the form.

For these reasons, the court: (1) GRANTS Parris Jordan until February 17, 2026, to file an amended complaint; and (2) CAUTIONS Parris Jordan that, if he does not respond by the deadline, this case will be dismissed under 28 U.S.C. § 1915A without further notice because the current complaint does not state a claim for which relief can be granted. SO ORDERED on January 14, 2026 /s/JON E. DEGUILIO JUDGE UNITED STATES DISTRICT COURT