

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PRECEDENTIAL VALUE	unpublished, nonprecedential district court opinion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)