

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN

Matthew C. Stechauner v. Matthew Baxter, Kellen Sturz, Eric
Norman, Sue Booker, Marc Oltra, and Kevin Frost

Stechauner v. Baxter · No. 24-cv-111-jdp · Decided March 11, 2026

SUMMARY

The United States District Court for the Western District of Wisconsin granted defendants’ motion for summary judgment and denied plaintiff Matthew C. Stechauner’s motions in an Eighth Amendment failure-to-protect action. The court held that a correctional officer’s disclosure of Stechauner’s sexual-victimization designation could be found negligent but not deliberately or recklessly undertaken, and that officials reasonably separated Stechauner from the inmate who assaulted him. The court denied spoliation sanctions, dismissed the case, and directed the clerk to enter judgment.

CASE DETAILS

COURT	United States District Court for the Western District of Wisconsin
WRITING FOR THE COURT	James D. Peterson
JURISDICTION	United States District Court for the Western District of Wisconsin
DECIDED	March 11, 2026
DOCKET	24-cv-111-jdp
DISPOSITION	dismissed
PROCEDURAL POSTURE	In a prisoner civil-rights action under 42 U.S.C. § 1983, both sides moved for summary judgment. The plaintiff also moved for spoliation sanctions.
STANDARD OF REVIEW	Summary judgment is appropriate when the undisputed facts show that the moving party is entitled to judgment as a matter of law. On summary judgment, the court credited plaintiff’s account where appropriate for purposes of evaluating defendants’ motion, but concluded that no reasonable jury could find an Eighth Amendment violation. An Eighth Amendment failure-to-protect claim requires proof that the prisoner was incarcerated under conditions posing a substantial risk of serious harm and that the defendant consciously disregarded that risk.

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

summary judgment

sanctions

PRACTICE AREAS

civil rights

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evidence and spoliation

QUESTIONS PRESENTED

1. Whether Baxter's negligent disclosure of Stechauner's confidential victimization-risk designation constituted deliberate indifference to a substantial risk of serious harm in violation of the Eighth Amendment.
2. Whether the alleged delay by Oltra and Frost in reporting and separating Stechauner from Hodge caused an actionable Eighth Amendment injury.
3. Whether Sturz, Norman, and Booker disregarded a substantial risk of harm by keeping Stechauner and Hodge in the same institution or unit after the assault.
4. Whether plaintiff was entitled to spoliation sanctions based on the alleged destruction of video footage of Baxter's disclosure.

HOLDINGS

1. Baxter's disclosure violated prison policy and was ill-advised, but the undisputed facts showed at most negligence rather than deliberate or criminally reckless disregard of a substantial risk of serious harm. Negligence is insufficient to establish an Eighth Amendment violation.
2. The claims against Oltra and Frost failed because Stechauner presented no evidence that the alleged delay in reporting the assault or separating him from Hodge caused him any injury.
3. The claims failed because officials housed Stechauner and Hodge in separate units after the investigation began, and the isolated later encounter between them did not show deliberate disregard of a substantial risk of harm.
4. Spoliation sanctions were not warranted because Stechauner did not show that defendants destroyed the footage in bad faith, and he did not establish prejudice at the summary-judgment stage.

KEY QUOTATIONS

"Negligence isn't enough to violate the Eighth Amendment." (Analysis § A)

"But the mere fact that an internal prison policy was violated doesn't itself prove a constitutional violation."
(Analysis § B)

"From these facts, no reasonable jury could conclude that defendants disregarded the risk of harm to Stechauner based on a single chance encounter despite officials deliberately housing the two inmates in separate units." (Analysis § B)

FACTUAL BACKGROUND

While incarcerated at Oshkosh Correctional Institution, Stechauner was classified by the Wisconsin Department of Corrections as being at high risk of sexual victimization. Correctional officer Matthew Baxter disclosed that designation while explaining why Stechauner could not be housed with another inmate who was classified as being at high risk of sexually assaulting other inmates; another inmate, Ryan Hodge, may have overheard the disclosure. Four days later, Hodge patted Stechauner's buttocks. Prison officials began a PREA investigation, placed Hodge in temporary lockup, and housed Stechauner and Hodge in separate units for the remainder of Stechauner's incarceration at the institution, except for a period in restricted housing where inmates could not contact one another.

PROCEDURAL HISTORY

Stechauner alleged that a correctional officer disclosed his confidential designation as being at high risk of sexual victimization, leading to an assault by another inmate, and that other prison officials failed to protect him after the assault. The court previously allowed him to proceed on Eighth Amendment claims. After discovery, both sides moved for summary judgment. The court denied plaintiff's motion for summary judgment and spoliation sanctions, granted defendants' motion for summary judgment, dismissed the case, and directed the clerk to enter judgment and close the case.

DISPOSITION

dismissed

CASES CITED

- Fitzpatrick v. Nys, 861 F. App'x 108, 110 (7th Cir. 2021)
- Farmer v. Brennan, 511 U.S. 825, 828 (1994)
- Dale v. Poston, 548 F.3d 563, 569 (7th Cir. 2008)
- Mayoral v. Sheahan, 245 F.3d 934, 938 (7th Cir. 2001)
- Burton v. Downey, 805 F.3d 776, 785 (7th Cir. 2015)
- Langston v. Peters, 100 F.3d 1235, 1238 (7th Cir. 1996)
- Lord v. Beahm, 952 F.3d 902, 905 (7th Cir. 2020)
- Boyce v. Moore, 314 F.3d 884, 888 (7th Cir. 2002)