

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Tyler Jordan v. Tennessee Department of Correction

No. 3:24-cv-01429 · No. No. 3:24-cv-01429 · Decided March 6, 2026

SUMMARY

The Middle District of Tennessee screened Tyler Jordan’s pro se prisoner civil-rights complaint under the Prison Litigation Reform Act. The court dismissed the claims against the Tennessee Department of Correction as barred by sovereign immunity and because TDOC is not a person subject to liability under 42 U.S.C. § 1983, but granted Jordan 30 days to amend his complaint to identify the correctional officers allegedly involved in the use of force.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Per Curiam
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	March 6, 2026
DOCKET	No. 3:24-cv-01429
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial screening of a pro se, in forma pauperis prisoner civil-rights complaint under the Prison Litigation Reform Act.
STANDARD OF REVIEW	The court conducted mandatory PLRA screening, accepted the complaint's factual allegations as true for screening purposes, and liberally construed the pro se pleading.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order
PARTIES	Tyler Jordan v. Tennessee Department of Correction

TOPICS

- section 1983
- sovereign immunity
- prisoners rights
- civil rights
- pleadings

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the Tennessee Department of Correction is a person subject to liability under 42 U.S.C. § 1983.
2. Whether Jordan's § 1983 damages claim against TDOC is barred by sovereign immunity under the Eleventh Amendment.
3. Whether the court should permit Jordan to amend his pro se complaint to identify the correctional officers and provide additional details supporting excessive-force claims.

HOLDINGS

1. The Tennessee Department of Correction is not a person for purposes of § 1983 liability.
2. Jordan's § 1983 excessive-force claim for damages against TDOC is barred by sovereign immunity.
3. The court permitted Jordan to file an amended complaint identifying the correctional officers who allegedly used force and providing additional details.

KEY QUOTATIONS

“Thus, Plaintiff’s excessive force claim against TDOC under Section 1983 cannot proceed.”

“In other words, an amended complaint will replace the original complaint.”

FACTUAL BACKGROUND

On May 22, 2024, two inmates allegedly breached Jordan's cell door at Riverbend Maximum Security Institution and attacked him, including striking him in the head with a metal paint roller. An unidentified correctional officer allegedly tased Jordan while he was defending himself, tased him again after he fell, and caused him to lose consciousness. Jordan further alleged that unidentified correctional officers later slammed him onto his bunk, punched him in the face, and kicked him in the back.

PROCEDURAL HISTORY

Tyler Jordan filed a complaint under 42 U.S.C. § 1983 alleging that correctional officers used excessive force against him after two inmates attacked him. The court screened the complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A and dismissed the claims against the Tennessee Department of Correction because TDOC is not a person subject to § 1983 liability and is protected by sovereign immunity. The court granted Jordan 30 days to file an amended complaint naming the correctional officers and supplying additional factual details.

DISPOSITION

dismissed

CASES CITED

- United States v. Smotherman, 838 F.3d 736, 739 (6th Cir. 2016)

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Thomas v. Eby, 481 F.3d
- Haines v. Kerner, 404 U.S. 519, 520–21 (1972)
- Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991)
- Dominguez v. Corr. Med. Servs., 555 F.3d 543, 549 (6th Cir. 2009)
- Sigley v. City of Panama Heights, 437 F.3d 527, 533 (6th Cir. 2006)
- Cordell v. McKinney, 759 F.3d 573, 580–81 (6th Cir. 2014)
- Williams v. Curtin, 631 F.3d 380, 383 (6th Cir. 2011)
- Combs v. Wilkinson, 315 F.3d 548, 556 (6th Cir. 2002)
- Hudson v. McMillian, 503 U.S. 1, 8–9 (1992)
- Whitley v. Albers, 475 U.S. 312, 321 (1986)
- Wilkins v. Gaddy, 559 U.S. 34, 37 (2010)
- Mumford v. Basinski, 105 F.3d 264, 267 (6th Cir. 1997)
- Owens v. O’Toole, No. 3:14-CV-02040, 2014 WL 5845733, at *3 (M.D. Tenn. Nov. 12, 2014)
- Cady v. Arenac Cty., 574 F.3d 334, 342 (6th Cir. 2009)
- Kentucky v. Graham, 473 U.S. 159, 169 (1985)
- LaFountain v. Harry, 716 F.3d 944, 2013 WL 2221569 (6th Cir. May 22, 2013)
- McGore v. Wrigglesworth, 114 F.3d 601 (6th Cir. 1997)

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