

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA

Dustin M. Pearson v. Dorean Mrs. (Cook Head), Christine Mrs.
(Cook Assistant), John Doe Madison County Jail Maintenance, John
Doe Madison County Jail Maintenance, Jane Doe Madison County
Jail Maintenance, Bradford Corrections Officer, and Sumpter Jail
Commander

Pearson · No. 1:26-cv-00362-JPH-CSW · Decided June 17, 2026

SUMMARY

The United States District Court for the Southern District of Indiana screened Dustin M. Pearson’s 42 U.S.C. § 1983 complaint concerning alleged exposure to sewage while incarcerated at Madison County Jail. The court dismissed the complaint for failure to state a claim, including because the allegations did not establish sufficient personal involvement by the named defendants and did not support claims against John and Jane Doe defendants. The court permitted Pearson to file an amended complaint by July 6, 2026.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana
WRITING FOR THE COURT	James Patrick Hanlon
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	June 17, 2026
DOCKET	1:26-cv-00362-JPH-CSW
DISPOSITION	other
PROCEDURAL POSTURE	A prisoner brought a 42 U.S.C. § 1983 action concerning conditions of confinement at Madison County Jail. The district court screened the complaint under 28 U.S.C. § 1915A, dismissed the complaint for failure to state a claim, and granted leave to file an amended complaint.
STANDARD OF REVIEW	At screening under 28 U.S.C. § 1915A, the court applies the same pleading standard used for a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6), accepting factual allegations as true but not legal conclusions. Pro se pleadings are construed liberally.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Dustin M. Pearson v. Dorean Mrs. (Cook Head), Christine Mrs. (Cook Assistant), John Doe Madison County Jail Maintenance, John Doe Madison County Jail Maintenance, Jane Doe Madison County Jail Maintenance, Bradford Corrections Officer, Sumpter Jail Commander

TOPICS

prisoners rights

section 1983

pleadings

civil procedure

fourteenth amendment

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible Fourteenth Amendment conditions-of-confinement claim against the jail personnel under 42 U.S.C. § 1983.
2. Whether the claims against unidentified John Doe defendants stated a claim sufficient to proceed.
3. Whether the allegations adequately pleaded each defendant's personal involvement in the alleged constitutional deprivation.
4. Whether Pearson should be allowed to amend the defective complaint rather than have the action dismissed immediately.

HOLDINGS

1. The complaint failed to state a claim for relief because it did not plead sufficient facts showing that any particular defendant was personally involved in the alleged unconstitutional conditions.
2. The claims against the John Doe defendants were dismissed because anonymous placeholders do not themselves state a viable claim or permit relation back.
3. The court dismissed the complaint without terminating the action and allowed Pearson an opportunity to file an amended complaint.

KEY QUOTATIONS

“When screening a complaint, the Court must dismiss any portion that is frivolous or malicious, fails to state a claim for relief, or seeks monetary relief against a defendant who is immune from such relief.” (§ I)

“To state a plausible claim, Mr. Pearson must allege not only that defendants were involved in allegedly unconstitutional conduct, but how they were involved.” (§ III)

“The amended complaint will completely replace the original.” (§ IV)

FACTUAL BACKGROUND

Pearson alleged that he was incarcerated at Madison County Jail from June 29 through September 13, 2024, and worked in the jail kitchen. He claimed that, during several sewage-pipe clogs, kitchen staff were ordered to help maintenance staff, resulting in exposure to sewage water and the dumping of sewage and trash into a river. He attributed the orders to Dorean and Christine and alleged that Sumpter, Bradford, and maintenance personnel were involved in one cleanup, but he did not allege specific acts by Sumpter or Bradford or sufficient knowledge and personal involvement by Dorean and Christine.

PROCEDURAL HISTORY

Pearson filed a pro se prisoner civil-rights complaint against jail staff. Before service, the court screened the complaint and concluded that the allegations did not plausibly establish personal involvement by any named defendant or otherwise state a viable Fourteenth Amendment conditions-of-confinement claim. The court dismissed the complaint but allowed Pearson until July 6, 2026, to file an amended complaint, warning that the action would be dismissed if he did not amend.

DISPOSITION

other

CASES CITED

- Schillinger v. Kiley, 954 F.3d 990, 993 (7th Cir. 2020)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Cesal v. Moats, 851 F.3d 714, 720 (7th Cir. 2017)
- Wudtke v. Davel, 128 F.3d 1057, 1060 (7th Cir. 1997)
- Colbert v. City of Chi., 851 F.3d 649, 657 (7th Cir. 2017)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Tate v. SCR Med. Transp., 809 F.3d 343, 346 (7th Cir. 2016)
- Luevano v. Wal-Mart, 722 F.3d 1014 (7th Cir. 2013)
- Beal v. Beller, 847 F.3d 897, 901 (7th Cir. 2017)

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