

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

Edwin Marshaun Elkins v. Marion Police Department, et al.

Elkins · No. 1:26-CV-149-HAB-ALT · Decided April 30, 2026

SUMMARY

The court grants Plaintiff Edwin Marshaun Elkins leave to file an amended complaint after finding that his pro se complaint contains insufficient factual detail, potentially impermissible claims under Heck v. Humphrey, and unrelated claims against multiple defendants. The court denies his emergency motion to stay, keeps his motion to proceed in forma pauperis under advisement, and sets June 1, 2026, as the deadline for filing an amended complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Holly A. Brady
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	April 30, 2026
DOCKET	1:26-CV-149-HAB-ALT
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff filed a civil-rights complaint and motions to proceed in forma pauperis and to stay the proceedings. The district court found the complaint deficient, denied the motion to stay, left the in forma pauperis motion under advisement, and granted leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an action filed in forma pauperis if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. Pro se pleadings are held to less stringent standards, but must still satisfy minimum pleading requirements.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reported citation
PARTIES	Edwin Marshaun Elkins v. Marion Police Department, Grant County Sheriff's Department, Various officers

TOPICS

pleadings

joinder

civil procedure

section 1983

fourteenth amendment

PRACTICE AREAS

Civil rights

Federal civil procedure

In forma pauperis proceedings

Pleading and joinder

QUESTIONS PRESENTED

1. Whether the complaint contained sufficient factual detail and complied with the Federal Rules of Civil Procedure.
2. Whether claims arising from ongoing criminal proceedings could be barred by *Heck v. Humphrey*.
3. Whether the complaint improperly joined unrelated claims and defendants.
4. Whether plaintiff was entitled to an emergency stay pending resolution of a state criminal case.
5. Whether the motion to proceed in forma pauperis should be granted at that stage.

HOLDINGS

1. The complaint was deficient because it lacked sufficient factual detail and improperly combined multiple unrelated claims involving different defendants; plaintiff was required to file an amended complaint identifying the jurisdictional basis, timeframe, facts, legal theories, and responsible defendants and limiting the action to related claims.
2. Claims that would collaterally attack ongoing state criminal prosecutions or criminal judgments may not proceed under the *Heck* doctrine unless the prosecution or judgment has been terminated in plaintiff's favor.
3. Based on the information submitted, plaintiff financially qualified to proceed in forma pauperis, but the court kept the motion under advisement pending submission of an amended complaint.

KEY QUOTATIONS

“Simply put, Elkins’s complaint has not given the Court enough information to discern whether he states claims for which relief can be granted and whether the claims are permissible in the same suit.”

“Plaintiff should only include related claims in his amended complaint and should file separate actions for unrelated claims against different defendants.”

FACTUAL BACKGROUND

Elkins sued the Marion Police Department, the Grant County Sheriff's Department, and multiple officers, alleging constitutional violations arising from several criminal and family-law cases. He alleged that some compulsory-school-attendance cases had been resolved in his favor, while another criminal case in Grant County remained pending. His complaint did not provide sufficient dates, facts, case numbers, or identification of which defendants allegedly caused particular injuries.

PROCEDURAL HISTORY

Elkins filed a complaint alleging constitutional violations arising from multiple criminal and family-law proceedings, along with a motion to proceed in forma pauperis. He later moved for an emergency stay pending resolution of a state criminal case. The court concluded that the complaint contained insufficient factual detail, potentially implicated the Heck bar, and improperly joined unrelated claims and defendants. The court granted leave to file an amended complaint by June 1, 2026, denied the stay, and stated that failure to amend would result in dismissal under Federal Rule of Civil Procedure 41(b).

DISPOSITION

other

CASES CITED

- Adkins v. E.I. DuPont de Nemours & Co., 335 U.S. 331, 339 (1948)
- Merritte v. Templeton, 493 F. App'x 782, 784 (7th Cir. 2012)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Heck v. Humphrey, 512 U.S. 477 (1994)
- McDonough v. Smith, McDonough v. Smith, 588 U.S. 109, 118-19
- Kadamovas v. Stevens, 706 F.3d 843, 846 (7th Cir. 2013)
- Wheeler v. Wexford Health Sources, Inc., 689 F.3d 680, 683 (7th Cir. 2012)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)