

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

**Chauncey Stewart, a/k/a Chonice Stewart v. Edward Castine,
individually, Dean Laclair, individually, Matthew Gravelle,
individually, Kevin Santo, individually, Todd Strack, individually, N.
Johnson, individually, N. Young, individually, Benjamin Darrah,
individually, and John and Jane Doe 1 through 10**

Stewart · No. 9:25-cv-486 (ECC/ML) · Decided March 19, 2026

SUMMARY

The court granted the named defendants’ Rule 12(b)(6) motion in this 42 U.S.C. § 1983 action arising from an alleged use of excessive force against an incarcerated plaintiff and his subsequent criminal prosecution. The court dismissed the malicious prosecution and fair trial claims without prejudice because the plaintiff was already incarcerated on unrelated charges and therefore did not allege an actionable post-arraignment deprivation of liberty. The supervisory liability claim was dismissed with prejudice because standalone supervisory liability is not independently cognizable under Second Circuit precedent.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Elizabeth C. Coombe
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 19, 2026
DOCKET	9:25-cv-486 (ECC/ML)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action arising from an alleged use of force during incarceration and a subsequent criminal prosecution. Named defendants moved under Federal Rule of Civil Procedure 12(b) (6) to dismiss the malicious prosecution, fair trial, and supervisory liability claims.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and draws reasonable inferences in the plaintiff's

	favor, but does not accept legal conclusions; the complaint must contain enough facts to state a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court memorandum-decision and order; persuasive but not binding precedent
PARTIES	Chauncey Stewart, a/k/a Chonice Stewart v. Edward Castine, Dean Laclair, Matthew Gravelle, Kevin Santo, Todd Strack, N. Johnson, N. Young, Benjamin Darrah, John and Jane Doe 1 through 10

TOPICS

section 1983 prisoners rights motions to dismiss civil procedure police misconduct

PRACTICE AREAS

civil rights litigation prisoner civil rights constitutional torts federal civil procedure

QUESTIONS PRESENTED

1. Whether Stewart plausibly alleged the deprivation-of-liberty element required for a § 1983 malicious prosecution claim when he was already incarcerated on unrelated charges.
2. Whether Stewart plausibly alleged a § 1983 fair trial claim when he remained incarcerated on unrelated charges during the prosecution.
3. Whether standalone supervisory liability claims remain cognizable under § 1983 after *Tangreti v. Bachmann*.

HOLDINGS

1. A plaintiff who is already incarcerated on unrelated charges and remains incarcerated throughout the challenged prosecution does not suffer an actionable deprivation of liberty from being compelled to attend the related criminal proceedings. Stewart therefore failed to state a § 1983 malicious prosecution claim.
2. Stewart failed to state a § 1983 fair trial claim because he did not allege an actionable deprivation of liberty resulting from the prosecution while he was already incarcerated on unrelated charges.
3. Standalone claims for supervisory liability are no longer cognizable under § 1983 in the Second Circuit. A plaintiff must instead plead and prove that each defendant, through the defendant's own individual actions, violated the Constitution.

KEY QUOTATIONS

“there is no special rule for supervisory liability. Instead, a plaintiff must plead and prove ‘that each Government-official defendant, through the official’s own individual actions, has violated the Constitution.’”

“Because the Second Circuit no longer recognizes supervisory liability as an independent claim under § 1983, Plaintiff’s claims for supervisory liability are dismissed, but evidence that Defendants acted in a

supervisory capacity may be used to establish direct liability for other claims.”

FACTUAL BACKGROUND

Stewart was incarcerated at Clinton Correctional Facility when corrections officers allegedly used force against him during an escort and in the medical clinic. Several officers allegedly forwarded false evidence to prosecutors stating that Stewart initiated the altercation, and Stewart was later indicted and prosecuted. Stewart attended pretrial proceedings and was acquitted, but he remained incarcerated on unrelated charges throughout the prosecution.

PROCEDURAL HISTORY

Stewart filed a § 1983 action and amended complaint asserting excessive force, malicious prosecution, fair trial, failure to intervene, and supervisory liability claims. The named defendants moved to dismiss three claims. The court granted the motion, dismissing the malicious prosecution and fair trial claims without prejudice and the supervisory liability claim with prejudice.

DISPOSITION

other

CASES CITED

- *Lynch v. City of New York*, 952 F.3d 67 (2d Cir. 2020)
- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Mayor & City Council of Baltimore v. Citigroup, Inc.*, 709 F.3d 129 (2d Cir. 2013)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)
- *Lawtone-Bowles v. City of New York*, 2017 WL 4250513 (S.D.N.Y. Sept. 22, 2017)
- *EEOC v. Port Authority*, 768 F.3d 247 (2d Cir. 2014)
- *ATSI Communications, Inc. v. Shaar Fund, Ltd.*, 493 F.3d 87 (2d Cir. 2007)
- *Jeanty v. City of New York*, 2024 WL 5236462 (E.D.N.Y. Dec. 28, 2024)
- *Posr v. Doherty*, 944 F.2d 91 (2d Cir. 1991)
- *Coleman v. City of New York*, 688 F. App'x 56 (2d Cir. 2017)
- *Albright v. Oliver*, 510 U.S. 266 (1994)
- *Singer v. Fulton County Sheriff*, 63 F.3d 110 (2d Cir. 1995)
- *Poulos v. County of Warren*, 2023 WL 4004692 (2d Cir. June 15, 2023)
- *Coffey v. Broome County*, 2025 WL 2391724 (N.D.N.Y. Aug. 18, 2025)
- *Walker v. Sankhi*, 494 F. App'x 140 (2d Cir. 2012)
- *Cisse v. Annucci*, 2022 WL 1183274 (N.D.N.Y. Apr. 21, 2022)
- *Doe v. Selsky*, 841 F. Supp. 2d 730 (W.D.N.Y. 2012)
- *Swartz v. Insogna*, 704 F.3d 105 (2d Cir. 2013)
- *Hoyos v. City of New York*, 999 F. Supp. 2d 375 (E.D.N.Y. 2013)

- Genia v. New York State Troopers, 2007 WL 869594 (E.D.N.Y. Mar. 20, 2007)
- Hutchins v. Solomon, 2018 WL 4757970 (S.D.N.Y. Sept. 29, 2018)
- Garnett v. Undercover Officer C0039, 838 F.3d 265 (2d Cir. 2016)
- Seabrook v. City of New York, 2016 WL 554823 (E.D.N.Y. Feb. 10, 2016)
- Lopez v. City of New York, 105 F. Supp. 3d 242 (E.D.N.Y. 2015)
- Tangreti v. Bachmann, 983 F.3d 609 (2d Cir. 2020)
- Sellers v. Andrea, 2022 WL 17830715 (D. Conn. Dec. 21, 2022)
- Porro v. Barnes, 624 F.3d 1322 (10th Cir. 2010)
- Kwelller v. County of Broome, 2025 WL 3280821 (N.D.N.Y. Nov. 25, 2025)
- Kistner v. City of Buffalo, 2023 WL 144915 (W.D.N.Y. Jan. 10, 2023)

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