

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Eddie Love v. Pulaski County Sheriff Department Jail, Lateia
Martin, and Jane Doe

Love · No. 26-cv-00302-JPG · Decided May 20, 2026

SUMMARY

The United States District Court for the Southern District of Illinois screened Eddie Love’s 42 U.S.C. § 1983 complaint alleging repeated sexual assault by a detention-center officer. The court allowed the Eighth and Fourteenth Amendment claim to proceed against Officer Lateia Martin, dismissed the claims against the Pulaski County Sheriff’s Department Jail and Jane Doe without prejudice, and directed service of the complaint on Martin.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	J. Phil Gilbert
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	May 20, 2026
DOCKET	26-cv-00302-JPG
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prisoner's complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	At § 1915A screening, the court liberally construes factual allegations in a pro se complaint and dismisses claims that are frivolous, malicious, fail to state a claim, or seek damages from an immune defendant.
PRECEDENTIAL VALUE	Unknown; district-court memorandum and order with no reporter citation.
PARTIES	Eddie Love v. Pulaski County Sheriff Department Jail, Lateia Martin, Jane Doe

TOPICS

- section 1983
- prisoners rights
- cruel and unusual punishment
- due process
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible Eighth or Fourteenth Amendment claim against Officer Lateia Martin based on alleged sexual assault of a restrained detainee or prisoner.
2. Whether the complaint stated a claim against Pulaski County Sheriff Department Jail and Jane Doe when it alleged no facts describing their involvement in the constitutional deprivation.

HOLDINGS

1. A complaint does not state a claim against a defendant merely by naming that defendant without alleging the defendant's involvement in the constitutional deprivation. Because Love alleged no facts against Pulaski County Sheriff Department Jail or Jane Doe, the claims against them were dismissed without prejudice.
2. Love's allegations that Officer Martin kissed him and repeatedly fondled his genitals while he was restrained plausibly stated an Eighth or Fourteenth Amendment claim, so Count 1 survived preliminary review against Martin.

KEY QUOTATIONS

“To say that sexual assault . . . committed [by an officer] against [inmates] objectively imposed [a] serious risk to their safety would be an understatement.” (376)

FACTUAL BACKGROUND

Love alleged that he was repeatedly sexually assaulted by Officer Lateia Martin at the Pulaski County Detention Center in July 2025. He alleged that Martin kissed him while he was fully restrained and repeatedly grabbed his genitals while placing him in restraints. The alleged assaults occurred between approximately July 16-20 and July 23-25, 2025.

PROCEDURAL HISTORY

Eddie Love filed a pro se 42 U.S.C. § 1983 complaint alleging that Officer Lateia Martin sexually assaulted him at the Pulaski County Detention Center. The district court screened the complaint under 28 U.S.C. § 1915A, dismissed the claims against Pulaski County Sheriff Department Jail and Jane Doe without prejudice for failure to allege their personal involvement, and allowed the sexual-assault claim against Martin to proceed. The court directed the Clerk to initiate service on Martin.

DISPOSITION

other

CASES CITED

- Rodriguez v. Plymouth Ambulance Serv., 577 F.3d 816, 821 (7th Cir.)
- Black v. Lane, 22 F.3d 1395, 1401 n. 8 (7th Cir.)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Kingsley v. Henderson, 576 U.S. 389, 396-97 (2015)
- J.K.J. v. Polk, 960 F.3d 367, 376 (7th Cir. 2020)

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