

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
WISCONSIN

**Knutson v. TK Health, Cpl. Johnson, J. Watemolen, Nurse Tracey,  
and Nurse Nadia**

Knutson · No. 26-CV-65 · Decided March 6, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin grants Jeremy Knutson leave to proceed in forma pauperis in his 42 U.S.C. § 1983 action concerning alleged inadequate medical care for a tooth infection. The court permits claims to proceed against Nurse Practitioner J. Watemolen, Nurse Tracey, Nurse Nadia, and Cpl. Johnson, but dismisses TK Health because the complaint does not identify a policy or custom supporting entity liability. The court orders service, collection of the filing fee, and other case-management procedures.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Wisconsin                                                                                                                                                                                                                                                                                       |
| WRITING FOR THE COURT | Byron B. Conway                                                                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the Eastern District of Wisconsin                                                                                                                                                                                                                                                                                       |
| DECIDED               | March 6, 2026                                                                                                                                                                                                                                                                                                                                            |
| DOCKET                | 26-CV-65                                                                                                                                                                                                                                                                                                                                                 |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Prisoner civil-rights screening order addressing the plaintiff's motion to proceed in forma pauperis and screening claims under 28 U.S.C. § 1915A.                                                                                                                                                                                                       |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915A, the court screened the complaint to determine whether it was frivolous or malicious, failed to state a claim upon which relief may be granted, or sought monetary relief from an immune defendant. The court applied the Rule 8 plausibility standard and the applicable Eighth or Fourteenth Amendment medical-care standards. |

QUESTIONS PRESENTED

- Whether Knutson should be permitted to proceed without prepaying the filing fee and without paying an initial partial filing fee.

2. Whether the complaint stated a plausible denial-of-medical-care claim under the Eighth Amendment or, if Knutson was a pretrial detainee, the Fourteenth Amendment.
3. Whether TK Health could be held liable under 42 U.S.C. § 1983 based on the alleged conduct of its employees.
4. Whether HIPAA provided a private right of action for the alleged disclosure of medical information.

#### **HOLDINGS**

1. Knutson was permitted to proceed in forma pauperis, and the court waived the initial partial filing fee because he lacked the assets and means to pay it, while requiring payment of the full statutory filing fee over time.
2. The complaint plausibly alleged denial-of-medical-care claims against Nurse Practitioner J. Watemolen, Nurse Tracey, Nurse Nadia, and Cpl. Johnson, allowing those claims to proceed.
3. The complaint failed to state a § 1983 claim against TK Health, and TK Health was terminated as a defendant.
4. HIPAA does not furnish a private right of action, so the alleged disclosure of Knutson's medical information did not state an actionable HIPAA claim.

#### **FACTUAL BACKGROUND**

While housed at the Brown County Jail, Knutson alleged that Nurse Practitioner J. Watemolen prescribed medication that caused hives and difficulty breathing. He alleged that Nurse Tracey and Nurse Nadia continued to offer the medication after being told he was allergic to lincosamides, that his tooth infection remained untreated, and that he had been waiting a month to see a dentist. He further alleged that Cpl. Johnson received emails about the infection but did nothing, and that TK Health staff discussed his medical information in front of correctional officers and inmates.

#### **PROCEDURAL HISTORY**

Jeremy Knutson, a state prisoner proceeding pro se, filed a § 1983 complaint and moved to proceed without prepaying the filing fee. The court granted in forma pauperis status, screened the complaint, dismissed TK Health as a defendant for failure to state a claim, and allowed medical-care claims to proceed against Nurse Practitioner J. Watemolen, Nurse Tracey, Nurse Nadia, and Cpl. Johnson. The court ordered service and responsive pleadings.

#### **DISPOSITION**

other