

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Marquis Kinnel v. Commissioner Quiros, et al.

No. 3:25cv518 (OAW) (D. Conn. Feb. 10, 2026) · No. No. 3:25cv518 (OAW) · Decided February 10, 2026

SUMMARY

The United States District Court for the District of Connecticut conducted an initial review of Marquis Kinnel’s 42 U.S.C. § 1983 claims arising from prison disciplinary proceedings and a cell search. The court dismissed the federal claims without prejudice, concluding that the complaint failed to establish personal involvement, a cognizable due process violation, an Eighth Amendment violation, or facts supporting conspiracy. The court declined supplemental jurisdiction over state-law claims and granted Kinnel one opportunity to amend.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Omar A. Williams
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	February 10, 2026
DOCKET	No. 3:25cv518 (OAW)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial review of a sentenced prisoner's pro se complaint under the Prison Litigation Reform Act, 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under the Prison Litigation Reform Act, the court must dismiss a prisoner complaint or any portion of it that is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. The court accepted the complaint's factual allegations as true for initial review and assessed whether they plausibly stated federal claims.
PRECEDENTIAL VALUE	Unknown; district-court initial review order
PARTIES	Marquis Kinnel v. Commissioner Quiros, Correction Officer Decoteau, Lieutenant Parsons, Correction Officer Palladino, Disciplinary Report Investigator Reyes, Disciplinary Report Investigator Santaniello, Counselor/Advisor Laguna, Lieutenant Landolina, Correction Officer Philibert, Lieutenant/Disciplinary

TOPICS

section 1983 prisoners rights due process civil procedure civil rights

PRACTICE AREAS

civil rights prisoner litigation constitutional law civil procedure remedies

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged personal involvement by Commissioner Quiros, Warden Guardarrama, and District Administrator Nick Rodriguez sufficient to support § 1983 damages claims.
2. Whether Plaintiff's procedural due process claims concerning prison disciplinary proceedings were barred by *Heck v. Humphrey* and *Peralta v. Vasquez* because the proceedings resulted in forfeiture of sentence-related credits.
3. Whether, apart from the sentence-credit forfeiture, the disciplinary sanctions alleged an atypical and significant hardship creating a protected liberty interest.
4. Whether allegations that Defendants issued allegedly false disciplinary reports stated a constitutional due process claim.
5. Whether the complaint plausibly alleged an Eighth Amendment excessive-force or deliberate-indifference claim.
6. Whether the complaint plausibly alleged a conspiracy to violate Plaintiff's constitutional rights.
7. Whether the court should exercise supplemental jurisdiction over Plaintiff's state-law claims after dismissing the federal claims.

HOLDINGS

1. A plaintiff seeking damages under § 1983 must allege facts establishing each defendant's personal involvement in the asserted constitutional violation, including supervisory officials. Because the complaint alleged no conduct by Commissioner Quiros, Warden Guardarrama, or Nick Rodriguez connecting them to the violations, the damages claims against them were dismissed without prejudice.
2. An inmate has no general constitutional right to be free from being falsely accused in a misbehavior report; therefore, any due process claim based solely on allegedly false disciplinary charges was dismissed.
3. A § 1983 procedural due process challenge to prison disciplinary proceedings is barred when success would necessarily imply the invalidity of a deprivation affecting the duration of confinement, unless the underlying sanction has been invalidated or the prisoner waives for all time any challenge to that sanction.

4. The alleged sanctions, excluding the forfeiture of Risk Reduction Earned Credit days, did not plausibly constitute an atypical and significant hardship in relation to the ordinary incidents of prison life; therefore, Plaintiff did not allege a cognizable liberty interest supporting procedural due process protection.
5. Conclusory allegations that Plaintiff was subjected to cruel and unusual punishment, without facts showing excessive force or deliberate indifference to health or safety, failed to state an Eighth Amendment claim.
6. A § 1983 conspiracy claim requires factual allegations suggesting that the defendants reached an express or tacit agreement to achieve an unlawful end; conclusory, vague, or general allegations are insufficient.
7. After dismissing all federal claims, the court declined to exercise supplemental jurisdiction over Plaintiff's state-law claims under 28 U.S.C. § 1367(c)(3).

KEY QUOTATIONS

“A plaintiff seeking monetary damages from a defendant must allege facts which establish the personal involvement of that defendant in the alleged constitutional violation.” (Discussion II.A)

“In the prison context, which involves persons whose liberty interests have already been severely restricted because of their confinement, a plaintiff cannot show a cognizable deprivation of “liberty” unless he can show that he was subjected to an “atypical and significant hardship . . . in relation to the ordinary incidents of prison life.”” (Discussion II.B)

“It is well settled that claims of conspiracy containing only conclusory, vague, or general allegations of conspiracy to deprive a person of constitutional rights cannot withstand a motion to dismiss.” (Discussion II.C)

FACTUAL BACKGROUND

Plaintiff, a sentenced prisoner at MacDougall-Walker Correctional Institution, alleged that correctional officers searched his cell, issued disciplinary reports, and accused him of resisting and possessing contraband. He alleged that investigators and a disciplinary hearing officer refused or failed to investigate requested laboratory testing and video footage, and that he was found guilty and received seven days of punitive segregation, 90 days' tablet loss, 60 days' mail loss, and forfeiture of 15 days of Risk Reduction Earned Credits. He also asserted that supervisory officials lacked personal involvement, that the disciplinary proceedings violated due process, that Defendants subjected him to cruel and unusual punishment, and that they conspired to violate his constitutional rights.

PROCEDURAL HISTORY

Plaintiff filed a 42 U.S.C. § 1983 complaint alleging Fourteenth Amendment due process, Eighth Amendment, and conspiracy claims, along with state-law claims, arising from prison disciplinary proceedings. On initial review, the court dismissed all federal claims without prejudice, declined supplemental jurisdiction over the state-law claims, and granted Plaintiff one opportunity to amend by March 12, 2026. The court warned that failure to amend would result in dismissal with prejudice.

DISPOSITION

dismissed

CASES CITED

- Giraldo v. Kessler, 694 F.3d 161, 164 (2d Cir. 2012)
- Bey v. Doe, No. 3:24-CV-1307 (SVN), 2025 WL 1167490, at *1 n.1 (D. Conn. Apr. 21, 2025)
- Cruz v. Naqvi, No. 3:21-cv-49 (MPS), 2021 WL 1406102, at *4 (D. Conn. Apr. 14, 2021)
- Blyden v. Mancusi, 186 F.3d 252, 264 (2d Cir. 1999)
- Wright v. Smith, 21 F.3d 496, 501 (2d Cir. 1994)
- Moffitt v. Town of Brookfield, 950 F.2d 880, 886 (2d Cir. 1991)
- Tangreti v. Bachman, 983 F.3d 609, 620 (2d Cir. 2020)
- Oh v. Quiros, No. 3:24-CV-148 (SVN), 2024 WL 896605, at *3 (D. Conn. Mar. 1, 2024)
- Smith v. Perez, No. 3:19-CV-1758 (VAB), 2020 WL 2307643, at *5 (D. Conn. May 8, 2020)
- Swarthout v. Cooke, 562 U.S. 216, 219 (2011) (per curiam)
- Sandin v. Conner, 515 U.S. 472, 484 (1995)
- Davis v. Barrett, 576 F.3d 129, 133-134 (2d Cir. 2009) (per curiam)
- Palmer v. Richards, 364 F.3d 60, 64 (2d Cir. 2004)
- Boddie v. Schnieder, 105 F.3d 857, 862 (2d Cir. 1997)
- Freeman v. Rideout, 808 F.2d 949, 951 (2d Cir. 1986)
- Heck v. Humphrey, 512 U.S. 477, 486-487 (1994)
- Preiser v. Rodriguez, 411 U.S. 475, 490 (1973)
- Green v. Riffo, No. 18-CV-960, 2019 WL 2302412, at *9 (D. Conn. May 29, 2019)
- Peralta v. Vasquez, 467 F.3d 98, 104 (2d Cir. 2006)
- Edwards v. Balisok, 520 U.S. 641, 646 (1997)
- St. Louis v. McClain, 2018 WL 6421060, at *3 (D. Conn. 2018)
- Harnage v. Brighthaupt, 168 F. Supp. 3d 400, 412 (D. Conn. 2016), aff'd, 720 F. App'x 79 (2d Cir. 2018)
- Phelps v. Kapnolas, 308 F.3d 180, 185 (2d Cir. 2002)
- Gregg v. Georgia, 428 U.S. 153, 173 (1976)
- Hudson v. McMillian, 503 U.S. 1, 4 (1992)
- Farmer v. Brennan, 511 U.S. 825, 834-835 (1994)
- Sims v. Artuz, 230 F.3d 14, 21 (2d Cir. 2000)
- Morgan v. Dzurenda, 956 F.3d 84, 89 (2d Cir. 2020)
- Collazo v. Pagano, 656 F.3d 131, 135 (2d Cir. 2011) (per curiam)
- Goode v. Salias, No. 3:24-CV-1010, 2024 WL 3718268, at *5 (D. Conn. Aug. 8, 2024)
- Spavone v. N.Y. State Dep't of Corr. Servs., 719 F.3d 127, 138 (2d Cir. 2013)
- Hilton v. Wright, 673 F.3d 120, 127 (2d Cir. 2012) (per curiam)

- *Burke v. Lamont*, No. 3:22-CV-475 (OAW), 2022 WL 3997549, at *14 (D. Conn. Sept. 1, 2022)
- *Monger v. Conn. Dep't of Transp.*, No. 3:17-CV-00205 (JCH), 2017 WL 3996393, at *5 (D. Conn. Sept. 11, 2017)
- *Webb v. Goord*, 340 F.3d 105, 110 (2d Cir. 2003)
- *Romer v. Morgenthau*, 119 F. Supp. 2d 346, 363 (S.D.N.Y. 2000)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 554, 556 (2007)
- *Brook v. Ruotolo*, No. 23-1339, 2024 WL 3912831, at *3 (2d Cir. Aug. 23, 2024) (summary order)
- *Storck v. Suffolk Cnty. Dep't of Soc. Servs.*, 62 F. Supp. 2d 927, 940 (E.D.N.Y. 1999)

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