

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Michael Moore v. Thomas Dart, et al.

Moore v. Dart, No. 22-cv-1406 (N.D. Ill. Mar. 19, 2026) · No. 22-cv-1406 · Decided March 19, 2026

SUMMARY

The United States District Court for the Northern District of Illinois dismissed Michael Moore’s First Amendment retaliation claim against Cook County Sheriff Thomas Dart in his individual capacity. The court held that the complaint did not plausibly allege Dart’s personal involvement in the disciplinary charges that led to Moore’s termination. The court declined supplemental jurisdiction over the remaining state-law claims, dismissing them without prejudice and denying the Merit Board’s motion to dismiss as moot.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Steven C. Seeger
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	March 19, 2026
DOCKET	22-cv-1406
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a First Amendment retaliation claim against Sheriff Thomas Dart in his individual capacity and state-law claims against Dart in his official capacity, the Cook County Sheriff's Merit Board, and Cook County. On the defendants' renewed Rule 12(b)(6) motions, the court granted Dart's motion for failure to plead his personal involvement, declined supplemental jurisdiction over the remaining state-law claims, and denied the Merit Board's motion as moot.
STANDARD OF REVIEW	The court applied the Rule 12(b)(6) standard, accepting well-pleaded factual allegations as true and drawing reasonable inferences in the plaintiff's favor. A complaint must provide fair notice and plead a facially plausible claim.
PRECEDENTIAL VALUE	Unknown

TOPICS

motions to dismiss

section 1983

first amendment

civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

federal jurisdiction

QUESTIONS PRESENTED

1. Whether Moore adequately pleaded Sheriff Dart's personal involvement in the alleged First Amendment retaliation claim against Dart in his individual capacity.
2. Whether the court should exercise supplemental jurisdiction over the remaining state-law claims after dismissing the only federal claim.

HOLDINGS

1. A government official is not personally liable under § 1983 merely because the official heads an organization or is named in a signature block; the complaint must plausibly allege that the official personally caused or participated in the constitutional deprivation.
2. After dismissing all claims within its original jurisdiction before trial, the court may decline supplemental jurisdiction over the remaining state-law claims and ordinarily should dismiss those claims without prejudice.

KEY QUOTATIONS

"Liability for supervisors is individual, not vicarious. For that reason, simply being atop an organizational food chain does not make a supervisor liable for a subordinate's unconstitutional conduct."

"A signature is not a sufficient basis to infer personal involvement, especially when someone signs on behalf of someone else."

"The usual practice in this circuit is for district courts to 'dismiss without prejudice state supplemental claims whenever all federal claims have been dismissed prior to trial.'"

FACTUAL BACKGROUND

Michael Moore, a former Cook County correctional officer, represented himself as the deceased Officer Cuauhtemoc Estrada's partner and consequently received special access to Estrada's family, the criminal proceedings, and meetings concerning a proposed plea agreement. Moore opposed the plea agreement and engaged in a letter-writing campaign, while also engaging in conduct at trial that generated disciplinary complaints, including wearing a motorcycle vest displaying a "Sons of Anarchy" patch. The Cook County Sheriff's Office filed disciplinary charges, and the Sheriff's Merit Board terminated Moore after an evidentiary hearing. Moore alleged that the disciplinary action retaliated against his First Amendment activity, but the complaint did not allege that Sheriff Dart personally participated in the decision to pursue the charges or terminate him.

PROCEDURAL HISTORY

Moore previously survived a motion to dismiss on the narrow issue of whether his speech was protected, and he subsequently amended his complaint several times. The operative third amended complaint asserted three claims. The court held that the First Amendment claim against Dart did not allege that Dart personally participated in the challenged disciplinary action, dismissed that claim with prejudice, dismissed the remaining state-law claims without prejudice after declining supplemental jurisdiction, and denied the Merit Board's motion to dismiss as moot.

DISPOSITION

dismissed

CASES CITED

- Moore v. Dart, 2024 WL 361240 (N.D. Ill. 2024)
- Gibson v. City of Chicago, 910 F.2d 1510, 1520 (7th Cir. 1990)
- AnchorBank, FSB v. Hofer, 649 F.3d 610, 614 (7th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Milchtein v. Milwaukee County, 42 F.4th 814, 824 (7th Cir. 2022)
- Hess v. Garcia, 72 F.4th 753, 767 (7th Cir. 2023)
- Bostic v. Murray, 160 F.4th 831, 841 (7th Cir. 2025)
- Snowden v. Illinois Department of Human Services, 75 F.4th 789, 796 (7th Cir. 2023)
- Toran v. Bzdawka, 72 F. App'x 457, 462 (7th Cir. 2003)
- Hagan v. Quinn, 867 F.3d 816, 830 (7th Cir. 2017)
- Grace v. Eli Lilly & Co., 193 F.3d 496, 501 (7th Cir. 1999)
- Al's Service Center v. BP Products North America, Inc., 599 F.3d 720, 727 (7th Cir. 2010)

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