

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, SPRINGFIELD DIVISION

Ieshia Paul-Edwards v. Derek Heinz, et al.

Paul-Edwards · No. 3:25-cv-03270-JEH-RLH · Decided May 8, 2026

SUMMARY

The United States District Court for the Central District of Illinois ruled on motions to dismiss claims arising from alleged sexual misconduct at Logan Correctional Center. The court granted Defendant Sokol’s motion and granted in part and denied in part the IDOC Defendants’ motion, dismissing Counts II, III, and VI without prejudice while allowing the failure-to-protect claim against several correctional officers to proceed. Plaintiff was granted leave to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	May 8, 2026
DOCKET	3:25-cv-03270-JEH-RLH
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983 for failure to protect and failure to train or supervise, along with an Illinois willful-and-wanton-conduct claim. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(1) and 12(b)(6).
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court construes the complaint in the light most favorable to the plaintiff, accepts well-pleaded factual allegations as true, and draws reasonable inferences in plaintiff's favor. The complaint must contain sufficient factual matter to state a facially plausible claim. The court treated the qualified-immunity issue as unsuitable for resolution at the pleading stage because it turned on disputed facts.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status not stated

PARTIES

Ieshia Paul-Edwards v. Derek Heinz, et al.

TOPICS

motions to dismiss

section 1983

prisoners rights

qualified immunity

civil rights

PRACTICE AREAS

Civil rights

Prisoner litigation

Constitutional law

Federal civil procedure

Torts

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged that supervisory and PREA-related defendants were deliberately indifferent to a substantial risk of serious harm under the Eighth Amendment.
2. Whether the complaint plausibly alleged an Eighth Amendment failure-to-protect claim against correctional officers Hayes, Moore, Settles, and Bergschneider.
3. Whether the complaint stated a § 1983 failure-to-train claim against individual supervisory defendants.
4. Whether Illinois recognizes a separate and independent tort of willful and wanton misconduct.
5. Whether qualified immunity could be resolved at the pleading stage when deliberate indifference remained factually disputed.

HOLDINGS

1. The complaint did not allege sufficient facts to plausibly show that the supervisory, PREA, and IDOC defendants had actual knowledge of an impending or substantial risk of serious harm to plaintiff and deliberately disregarded that risk. Count II was dismissed without prejudice with leave to amend.
2. The complaint plausibly alleged that Hayes, Moore, Settles, and Bergschneider knew Heinz's relationship with plaintiff was inappropriate, understood that the conduct posed a substantial risk of harm, and consciously disregarded that risk. Count IV survived the motions to dismiss.
3. The complaint failed to state a plausible § 1983 failure-to-train claim against the individual defendants because its allegations were conclusory and did not connect the individual defendants' conduct to the alleged constitutional deprivation. Count III was dismissed without prejudice with leave to amend.
4. Illinois does not recognize a separate and independent common-law tort of willful and wanton misconduct. Count VI was dismissed without prejudice with leave to amend.
5. The court declined to resolve qualified immunity at the pleading stage because the defense turned on the disputed factual issue of whether defendants were deliberately indifferent.

KEY QUOTATIONS

“When considering a Rule 12(b)(6) motion to dismiss, the court must construe the complaint in the light most favorable to the plaintiff, accept all well-pleaded factual allegations as true, and draw all reasonable inferences from those facts in favor of the plaintiff.” (Section II)

“A prison official acts with deliberate indifference if he “knows of and disregards an excessive risk to inmate health or safety; the official must both be aware of the facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference.”” (Section III.A)

“A deliberate indifference claim premised on a supervisor’s alleged “failure to train” a subordinate employee is “extremely limited” and requires the plaintiff to allege facts plausibly showing that the supervisor knew that their failure to train the subordinate would cause constitutional injury.” (Section III.B)

“Illinois courts have consistently held that there is no separate and independent tort of willful and wanton misconduct in the common law of this state.” (Section III.C)

FACTUAL BACKGROUND

Plaintiff alleged that while incarcerated at Logan Correctional Center, correctional officer Derek Heinz groomed her, controlled aspects of her daily life, pressured her to expose herself, and touched her leg and the area next to her vagina without permission. She alleged that numerous IDOC officials and PREA-related personnel knew of a longstanding pattern of staff sexual misconduct at Logan and failed to protect prisoners or adequately train and supervise staff. She also alleged that correctional officers Hayes, Moore, Settles, and Bergschneider observed or knew that her relationship with Heinz was inappropriate, warned her to stay away from him, or told her the situation was getting out of hand, but did not report or otherwise intervene.

PROCEDURAL HISTORY

Plaintiff filed the complaint on September 12, 2025. Defendant Sokol moved to dismiss Counts II, III, and VI, and the IDOC Defendants moved to dismiss Counts II, III, IV, and VI. The court granted Sokol's motion, granted the IDOC Defendants' motion in part and denied it in part, dismissed Counts II, III, and VI without prejudice, dismissed the specified defendants without prejudice, and allowed plaintiff to amend by June 8, 2026.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Plaintiff may file an amended complaint by June 8, 2026. If she does not, Hayes, Settles, Moore, and Bergschneider must answer the existing complaint by June 29, 2026.

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- United States ex rel. Berkowitz v. Automation Aids, Inc., 896 F.3d 834, 839 (7th Cir. 2018)
- Farmer v. Brennan, 511 U.S. 825, 837-38, 843, 847 (1994)
- Sinn v. Lemmon, 911 F.3d 412, 419, 423 (7th Cir. 2018)
- Doe v. Macleod, No. 18-3191, 2023 WL 2698672, at *9 (C.D. Ill. Mar. 29, 2023)

- Shields v. Dart, 664 F.3d 178, 181 (7th Cir. 2011)
- Brown v. Budz, 398 F.3d 904, 913 (7th Cir. 2005)
- Minix v. Canarecci, 597 F.3d 824, 833 (7th Cir. 2010)
- Palmer v. Marion County, 327 F.3d 588, 594 (7th Cir. 2003)
- Gayton v. McCoy, 593 F.3d 610, 622 (7th Cir. 2010)
- Chavez v. Illinois State Police, 251 F.3d 612, 651 (7th Cir. 2001)
- Gentry v. Duckworth, 65 F.3d 555, 561 (7th Cir. 1995)
- Backes v. Village of Peoria Heights, Illinois, 662 F.3d 866, 870 (7th Cir. 2011)
- Santiago v. Walls, 599 F.3d 749, 756 (7th Cir. 2010)
- Pierson v. Hartley, 391 F.3d 898, 902 (7th Cir. 2004)
- Sanville v. McCaughtry, 266 F.3d 724, 739-40 (7th Cir. 2001)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658, 694 (1978)
- Michel v. Pretorius, No. 24-cv-00588, 2025 WL 1827944, at *5 (S.D. Ind. July 2, 2025)
- Sharp v. Miller, No. 25-cv-1139, 2025 WL 1372971, at *4 (C.D. Ill. May 12, 2025)
- Ghashiyah v. Frank, No. 07-C-308-C, 2007 WL 5517455, at *2 (W.D. Wis. Aug. 1, 2007)
- Sparks v. Starks, 367 Ill. App. 3d 834, 837 (1st Dist. 2006)
- Ziarko v. Soo Line Railroad Co., 161 Ill. 2d 267, 274 (1994)
- Morrow v. L.A. Goldschmidt Associates, Inc., 112 Ill. 2d 87 (1986)
- Mucklow v. John Marshall Law School, 176 Ill. App. 3d 886 (1988)
- Brooks v. McLean County Unit District No. 5, 2014 IL App (4th) 130503, ¶ 20
- Roldan v. Stroud, 52 F.4th 335, 339 (7th Cir. 2022)

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