

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN

Mark K. Anderson, Jr. v. State of Wisconsin and DOC-Department of
Corrections-Sgt. Rohwer

No. 3:25-cv-00938 · No. 3:25-cv-00938 · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Wisconsin dismissed Mark K. Anderson, Jr.'s pro se prisoner civil rights complaint at the screening stage. The court concluded that the complaint improperly joined unrelated claims and defendants and failed to satisfy the Federal Rules of Civil Procedure's pleading and personal-involvement requirements. Anderson was granted until February 10, 2026, to file an amended complaint, and his motions for injunctive relief were denied as moot.

CASE DETAILS

COURT	United States District Court for the Western District of Wisconsin
WRITING FOR THE COURT	James D. Peterson
JURISDICTION	United States District Court for the Western District of Wisconsin
DECIDED	January 23, 2026
DOCKET	3:25-cv-00938
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 screened under 28 U.S.C. §§ 1915 and 1915A. The court dismissed the complaint for failure to comply with the Federal Rules of Civil Procedure, granted leave to amend, and denied pending motions for injunctive relief as moot.
STANDARD OF REVIEW	At screening, the court accepted the allegations as true, construed the pro se complaint generously, and applied the less stringent standard applicable to pleadings drafted without counsel.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

- joinder
- pleadings
- section 1983
- civil procedure
- injunctions

PRACTICE AREAS

civil procedure

civil rights

prisoner civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether the complaint complied with Federal Rules of Civil Procedure 18 and 20 governing joinder of claims and defendants.
2. Whether the complaint satisfied Rules 8(a)(2) and 8(d) by providing a short, plain, simple, concise, and direct statement giving each defendant fair notice of the alleged violation.
3. Whether the State of Wisconsin and the Department of Corrections were proper defendants for Anderson's § 1983 damages claims.
4. Whether the complaint adequately alleged Sergeant Rohwer's personal involvement in a constitutional violation.
5. Whether Anderson's motions for injunctive relief should be granted while the complaint failed to state a claim.

HOLDINGS

1. A plaintiff may bring unrelated claims against one defendant under Rule 18, but may not join unrelated claims against multiple defendants unless Rule 20's transaction-or-occurrence and common-question requirements are satisfied.
2. A complaint must provide a short and plain statement showing entitlement to relief, and each allegation must be simple, concise, and direct so that defendants receive fair notice of the claims against them.
3. A § 1983 claim must be based on each defendant's personal involvement in the alleged constitutional violation, and the complaint must identify the conduct attributable to each individual defendant.
4. A prisoner complaint may be dismissed at screening when it is legally frivolous or malicious, fails to state a claim, or seeks damages from a defendant immune from such relief; however, the plaintiff may be given an opportunity to amend to cure pleading defects.
5. Motions for injunctive relief are moot when the complaint presently states no claim upon which relief can be granted.

KEY QUOTATIONS

“Under Rule 18, a plaintiff may bring unrelated claims against a particular defendant. But a plaintiff cannot bring unrelated claims against more than one defendant.”

“Under Rule 20, defendants may be joined in one lawsuit only if the claims against them arise out of the same transactions or occurrences and present questions of law or fact that are common to them all.”

“Federal Rule of Civil Procedure 8(a)(2) requires a complaint to include “a short and plain statement of the claim showing that the pleader is entitled to relief.””

“If Anderson fails to submit an amended complaint by the deadline set below, I will dismiss the entire case

and I will direct the clerk of court to record a “strike” against him under 28 U.S.C. § 1915(g).”

FACTUAL BACKGROUND

Anderson is incarcerated at Columbia Correctional Institution. He alleged that prison staff failed to properly treat a medical condition and failed to intervene promptly during an assault by another inmate. He named the State of Wisconsin, the Department of Corrections, and Sergeant Rohwer, but did not adequately identify the conduct of individual defendants or limit the complaint to claims arising from a common series of events.

PROCEDURAL HISTORY

Mark K. Anderson, proceeding without counsel, filed a prisoner civil-rights complaint alleging inadequate medical care and prison staff's failure to intervene in an inmate assault. After Anderson made the initial partial filing-fee payment, the district court screened the complaint and dismissed it because it improperly joined unrelated claims and defendants, failed to provide adequate factual detail, and named defendants that could not be sued for damages or were not alleged to have been personally involved. The court allowed Anderson until February 10, 2026, to file an amended complaint and denied his motions for injunctive relief as moot.

DISPOSITION

dismissed

CASES CITED

- Arnett v. Webster, 658 F.3d 742, 751 (7th Cir. 2011)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Gentry v. Duckworth, 65 F.3d 555, 561 (7th Cir. 1995)
- Paul v. Marberry, 658 F.3d 702, 705 (7th Cir. 2011)