

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, HAMMOND DIVISION

Courtney Johnson v. Scott Fletcher, et al.

Johnson · No. 2:25-CV-191-TLS-AZ · Decided April 23, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Courtney Johnson’s amended 42 U.S.C. § 1983 claims alleging arrest without probable cause and failure to intervene. The court held that the claims were barred under Heck v. Humphrey because success would necessarily imply the invalidity of convictions arising from the arrest. The dismissal was without prejudice under 28 U.S.C. § 1915A, allowing refiling if the convictions are later vacated.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Hammond Division
WRITING FOR THE COURT	Theresa L. Springmann
JURISDICTION	United States District Court for the Northern District of Indiana, Hammond Division
DECIDED	April 23, 2026
DOCKET	2:25-CV-191-TLS-AZ
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a prisoner's amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court screened the prisoner’s amended complaint under 28 U.S.C. § 1915A and accepted well-pleaded allegations for purposes of screening while liberally construing the pro se pleading.
PRECEDENTIAL VALUE	Unpublished federal district court opinion; generally nonprecedential.
PARTIES	Courtney Johnson v. Scott Fletcher, Greg Kelly, Chris McAninch, Gage Kelly

TOPICS

- probable cause
- fourth amendment
- section 1983
- prisoners rights
- pleadings

PRACTICE AREAS

Civil rights

Prisoner civil rights

Criminal procedure

Constitutional law

Federal civil procedure

QUESTIONS PRESENTED

1. Whether Johnson's Fourth Amendment wrongful-arrest claim under 42 U.S.C. § 1983 was barred by *Heck v. Humphrey* because success on the claim would necessarily imply the invalidity of convictions arising from the arrest.
2. Whether the amended complaint should be dismissed as frivolous under 28 U.S.C. § 1915A.

HOLDINGS

1. A prisoner may not proceed under § 1983 on a wrongful-arrest claim when a judgment in the prisoner's favor would necessarily imply the invalidity of outstanding convictions arising from the arrest; the claim is unavailable unless those convictions are overturned.
2. The court must dismiss a prisoner's complaint at screening if it is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant; Johnson's wrongful-arrest challenge was frivolous because it was filed after the relevant convictions but before they had been set aside.

KEY QUOTATIONS

“Probable cause is an absolute defense to any claim under § 1983 for wrongful arrest or false imprisonment.”

“A document filed pro se is to be liberally construed, and a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.”

“This case is DISMISSED WITHOUT PREJUDICE as frivolous under 28 U.S.C. § 1915A.”

FACTUAL BACKGROUND

Johnson alleged that Grant County officers arrested him on July 6, 2024, without probable cause after officers pursued people who had fled from a vehicle on foot. He claimed there was no evidence, apart from his location, connecting him to the vehicle, and relied on deposition testimony that Officer McAninch could not identify him as an occupant during the pursuit and that Johnson did not match the description of the fleeing occupants. Johnson had been convicted of dealing and traffic-related offenses arising from the arrest, including resisting law enforcement by using a vehicle, driving while suspended, and reckless driving.

PROCEDURAL HISTORY

Johnson, a prisoner proceeding without counsel, filed an amended complaint alleging that officers arrested him without probable cause and that other officers failed to intervene. The court reviewed the amended complaint under the Prison Litigation Reform Act screening provision. Because Johnson had been convicted of offenses arising from the arrest, and a finding that the arrest was unlawful would necessarily imply the invalidity of convictions for resisting law enforcement by vehicle, driving while suspended, and reckless driving, the court dismissed the action without prejudice as frivolous under § 1915A.

DISPOSITION

dismissed

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Tobey v. Chibucos, 890 F.3d 634, 647 (7th Cir. 2018)
- McBride v. Grice, 576 F.3d 703, 706-07 (7th Cir. 2009)
- Simmons v. Pryor, 26 F.3d 650, 654 (7th Cir. 1993)
- Bailey v. City of Chicago, 779 F.3d 689, 694 (7th Cir. 2015)
- Norris v. Serrato, 761 Fed. Appx. 612, 615 (7th Cir. 2019)
- Mustafa v. City of Chicago, 442 F.3d 544, 547 (7th Cir. 2006)
- Whitlock v. Brown, 596 F.3d 406, 411 (7th Cir. 2010)
- Heck v. Humphrey, 512 U.S. 477, 487 (1994)
- Edwards v. Balisok, 520 U.S. 641, 643 (1997)