

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA, FORT WAYNE DIVISION

Davis v. Thomas

Davis · No. 1:26-CV-113-GSL-AZ · Decided March 9, 2026

SUMMARY

The United States District Court for the Northern District of Indiana finds that Tyler S. Davis's prisoner complaint, alleging that an officer improperly gave his legal mail to another inmate and later returned it opened, fails to state a claim under 28 U.S.C. § 1915A. The court grants Davis until April 13, 2026, to file an amended complaint and cautions that the case will otherwise be dismissed without further notice.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	March 9, 2026
DOCKET	1:26-CV-113-GSL-AZ
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prisoner complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court reviewed the prisoner's complaint under 28 U.S.C. § 1915A and applied the Rule 8 plausibility standard, accepting well-pleaded factual allegations as true for purposes of screening.
PRECEDENTIAL VALUE	Unpublished district court opinion; limited persuasive value.
PARTIES	Tyler S. Davis v. Brady Thomas, Z. Shifflett, I. Taylor

TOPICS

- pleadings
- prisoners rights
- civil procedure
- first amendment
- section 1983

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Davis's allegations that an officer temporarily gave his legal mail to another inmate and returned it opened stated a constitutional claim under 42 U.S.C. § 1983.
2. Whether the complaint should be dismissed at screening under 28 U.S.C. § 1915A for failure to state a claim.
3. Whether Davis should be permitted to amend the deficient complaint.

HOLDINGS

1. The complaint did not state a claim for relief because Davis did not allege sufficient facts showing that the mail was protected confidential legal mail, that the officer knew it was confidential, or that the alleged interference was part of a regular and unjustified pattern of mail tampering.
2. The complaint failed to state a claim for which relief could be granted under the prisoner-complaint screening standard in 28 U.S.C. § 1915A.
3. Davis was granted leave to file an amended complaint consistent with the events alleged in the original complaint by April 13, 2026.

KEY QUOTATIONS

“But even if this mail was confidential and properly labeled, “an isolated incident of mail tampering is usually insufficient to establish a constitutional violation. Rather, the inmate must show that prison officials regularly and unjustifiably interfered with the incoming legal mail.”” (at 2)

“This complaint does not state a claim for which relief can be granted.” (at 2)

“The usual standard in civil cases is to allow defective pleadings to be corrected, especially in early stages, at least where amendment would not be futile.” (at 2)

FACTUAL BACKGROUND

Davis alleged that on January 26, 2026, Officer I. Taylor gave Davis's legal mail to another inmate with the same last name. After the other inmate informed Taylor that the mail was not his, Taylor returned the mail to Davis opened. Davis described the material only as legal mail and did not allege that it was confidential, how it was labeled, or that prison officials regularly interfered with his incoming legal mail.

PROCEDURAL HISTORY

Tyler S. Davis, an incarcerated plaintiff proceeding without counsel, filed a complaint alleging that Officer I. Taylor gave Davis's legal mail to another inmate and later returned it opened. The district court concluded that the complaint did not state a claim for relief but granted Davis until April 13, 2026, to file an amended complaint and warned that failure to do so would result in dismissal under § 1915A.

DISPOSITION

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Freeman v. Wilson, No. 23-1962, 2023 WL 8274582, at *2 (7th Cir. Nov. 30, 2023)
- Wolff v. McDonnell, 418 U.S. 539, 576 (1974)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 556, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-679 (2009)
- Swanson v. Citibank, N.A., 614 F.3d 400, 403 (7th Cir. 2010)
- Davis v. Goord, 320 F.3d 346, 351 (2d Cir. 2003)
- Willis v. Washington, 172 F.3d 54 (7th Cir. 1999)
- Kincaid v. Vail, 969 F.2d 594, 602 (7th Cir. 1992)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA FORT WAYNE
DIVISION TYLER S. DAVIS, Plaintiff, v. CAUSE NO. 1:26-CV-113-GSL-AZ BRADY
THOMAS, Z. SHIFFLETT, I. TAYLOR, Defendants. OPINION AND ORDER Tyler S. Davis, a
prisoner without a lawyer, filed a complaint alleging Officer I. Taylor gave his legal mail to
another inmate at the DeKalb County Jail.

ECF 1. “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.” Erickson v. Pardus, 551 U.S. 89, 94 (2007) (quotation marks and citations omitted).
Nevertheless, under 28 U.S.C. § 1915A, the court must review the merits of a prisoner complaint
and dismiss it if the action is frivolous or malicious, fails to state a claim upon which relief may be
granted, or seeks monetary relief against a defendant who is immune from such relief.

Davis alleges Officer Taylor gave his legal mail to another inmate with the same last name on
January 26, 2026. “When inmate told him the legal mail was not for him then Taylor came to me
with my legal mail opened.” ECF 1 at 3. Davis does not describe the mail other than to say it is
legal mail. It is unclear whether it was actually a protected, confidential communication or
whether it was merely mail about a legal subject.

See Freeman v. Wilson, No. 23-1962, 2023 WL 8274582, at *2 (7th Cir. Nov. 30, 2023) (“Public
documents and routine and nonsensitive documents do not implicate the right of access [and he]
could not have any confidential communication from opposing counsel.” (cleaned up)). Even
assuming this mail was confidential, Davis does not explain how the defendant could have known
it was confidential legal mail because he does not say how it was labeled.

See *Wolff v. McDonnell*, 418 U.S. 539, 576 (1974). (“We think it entirely appropriate that the State require any such communications to be specially marked as originating from an attorney, with his name and address being given, if they are to receive special treatment.”). A complaint must contain sufficient factual matter “to state a claim to relief that is plausible on its face.” *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 570 (2007). “A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (citing *Twombly*, 550 U.S. at 556). “Factual allegations must be enough to raise a right to relief above the speculative level, on the assumption that all the allegations in the complaint are true (even if doubtful in fact).” *Twombly*, 550 U.S. at 555 (quotation marks, citations and footnote omitted). “[W]here the well-pleaded facts do not permit the court to infer more than the mere possibility of misconduct, the complaint has alleged—but it has not shown—that the pleader is entitled to relief.” *Iqbal*, 556 U.S. at 679 (quotation marks and brackets omitted).

Thus, “a plaintiff must do better than putting a few words on paper that, in the hands of an imaginative reader, might suggest that something has happened to her that might be redressed by the law.” *Swanson v. Citibank, N.A.*, 614 F.3d 400, 403 (7th Cir. 2010) (emphasis in original). But even if this mail was confidential and properly labeled, “an isolated incident of mail tampering is usually insufficient to establish a constitutional violation.

Rather, the inmate must show that prison officials regularly and unjustifiably interfered with the incoming legal mail.” *Davis v. Goord*, 320 F.3d 346, 351 (2nd Cir. 2003) (cleaned up). See also *Willis v. Washington*, 172 F.3d 54 (7th Cir. 1999) (“[N]o reasonable jury could infer that the alleged interference with his mail constituted an ongoing pattern of mail tampering which rises to the level of a constitutional violation [because a] ‘mere isolated incident of negligence... does not rise to the level of a constitutional violation actionable under section 1983.’ *Kincaid v. Vail*, 969 F.2d 594, 602 (7th Cir.1992).”).

This complaint does not state a claim for which relief can be granted. If Davis believes he can state a claim based on (and consistent with) the events described in this complaint, he may file an amended complaint because “[t]he usual standard in civil cases is to allow defective pleadings to be corrected, especially in early stages, at least where amendment would not be futile.” *Abu-Shawish v. United States*, 898 F.3d 726, 738 (7th Cir.

2018). To file an amended complaint, he needs to write this cause number on a Pro Se 14 (INND Rev. 2/20) Prisoner Complaint form which is available from his law library. He needs to write the word “Amended” on the first page above the title “Prisoner Complaint” and send it to the court after he properly completes the form.

For these reasons, the court: (1) GRANTS Tyler S. Davis until April 13, 2026, to file an amended complaint; and (2) CAUTIONS Tyler S. Davis if he does not respond by the deadline, this case

will be dismissed under 28 U.S.C. § 1915A without further notice because the current complaint does not state a claim for which relief can be granted. SO ORDERED on March 9, 2026 /s/Gretchen S. Lund JUDGE UNITED STATES DISTRICT COURT

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