

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Hannah P. Schmidt v. Winnebago County Sheriff's Department, et al.

Schmidt · No. 25-CV-783 · Decided January 8, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin denied Hannah P. Schmidt’s motion for default judgment against private defendants Amelia James and Adam James in an alleged false-arrest action. The court held that reporting information to police, without allegations of conspiracy or active procurement of the arrest, did not establish a constitutional or false-arrest claim against the private individuals. The court vacated the entry of default and dismissed those defendants without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
WRITING FOR THE COURT	Byron B. Conway
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	January 8, 2026
DOCKET	25-CV-783
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff, proceeding pro se, moved for default judgment against two private individual defendants who failed to respond to the complaint. The district court denied the motion, vacated the entry of default, and dismissed those defendants without prejudice.
STANDARD OF REVIEW	On a motion for default judgment, well-pleaded allegations are accepted as true, but the court must independently determine whether those allegations establish a prima facie case and entitlement to judgment as a matter of law.
PRECEDENTIAL VALUE	unpublished

TOPICS

- default judgment
- subject matter jurisdiction
- section 1983
- civil rights
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Schmidt was entitled to default judgment against the two nonappearing private defendants.
2. Whether the complaint stated a cognizable constitutional false-arrest claim against private citizens who allegedly provided erroneous information to police.
3. Whether the complaint otherwise established subject matter jurisdiction over the claims against those defendants.

HOLDINGS

1. Default judgment cannot be entered merely because defendants failed to respond; the complaint must still establish a prima facie case for liability and a legal basis for relief.
2. Private citizens cannot be held liable for a Fourth Amendment violation merely because they reported information to police that allegedly led to an arrest; liability requires allegations that they commanded or mounted a campaign to procure the arrest, or otherwise participated in it.
3. The claims against James and James must be dismissed without prejudice because the complaint failed to state a cognizable claim that would invoke the court's subject matter jurisdiction.

KEY QUOTATIONS

“Upon entry of default, the court accepts the well-pleaded allegations set forth in the complaint as true.”

“But the court must still evaluate “whether those well-pleaded allegations state a prima facie case as to liability.””

“Private individuals “may be liable for false arrest only upon a showing that they commanded or mounted a campaign... to procure the plaintiff’s arrest.””

“Default judgment cannot be entered because she does not allege a legal basis for relief.”

FACTUAL BACKGROUND

Schmidt alleged that Amelia James, also known as Amy Barker, and Adam James, also known as Adam Heindel, reported her to police for violating a restraining order after she left a negative review on their business website. She alleged that the report resulted in her arrest and detention in 2022. Her complaint characterized the report as erroneous but did not allege that the private defendants conspired with police, commanded her arrest, mounted a campaign to procure it, or otherwise participated in the arrest.

PROCEDURAL HISTORY

Schmidt filed an amended complaint seeking compensatory and punitive damages based on an alleged false arrest arising from a report made by Amelia James and Adam James. The two defendants failed to answer or otherwise respond, while the remaining defendants answered. Schmidt moved for default judgment in the

amount of \$20,000. The court concluded that the complaint did not establish a cognizable constitutional or false-arrest claim against the private defendants and did not otherwise establish a basis for subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- VLM Food Trading Int'l, Inc. v. Illinois Trading Co., 811 F.3d 247, 255 (7th Cir. 2016)
- Dundee Cement Co. v. Howard Pipe & Concrete Prods., Inc., 722 F.2d 1319, 1323 (7th Cir. 1983)
- Poff v. Weadge, No. 23-CV-43-WMC, 2025 WL 3470727, at *3 (W.D. Wis. Dec. 3, 2025)
- Heartland Footwear Sales Inc. v. 8215774 Canada, Inc., No. 3:19 CV 1142, 2021 WL 1732078, at *2 (N.D. Ind. May 3, 2021)
- Ford Motor Credit Co. LLC v. Fincannon Ford, Inc., No. 1:19-CV-502-HAB, 2020 WL 6336209, at *1
- Cass Cnty. Music Co. v. Muedini, 55 F.3d 263, 265 (7th Cir. 1995)
- Christensen v. County of Boone, 483 F.3d 454, 459 (7th Cir. 2007)
- Gaddis v. DeMattei, 30 F.4th 625, 633 (7th Cir. 2022)
- Butler v. Goldblatt Bros., 589 F.2d 323, 326 (7th Cir. 1978)
- Mirbeau of Geneva Lake, LLC v. City of Lake Geneva, 746 F. Supp. 2d 1000, 1008 (E.D. Wis. 2010)
- Hughes v. Meyer, 880 F.2d 967, 972 (7th Cir. 1989)
- Poole v. Walmart, Inc., No. 25 CV 603, 2025 WL 1399142, at *4 (N.D. Ill. May 14, 2025)
- Owens v. Quality Inn, No. 22-CV-29-WMC, 2023 WL 4762698 (W.D. Wis. July 26, 2023)