

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Waheed Jenkins v. Department of Corrections, et al.

Jenkins · No. 4:25-CV-01680 · Decided January 8, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Waheed Jenkins's pro se 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A(b)(1) for failure to state a claim. The court held that Jenkins failed to adequately plead personal involvement, deliberate indifference to serious medical needs, a protected liberty interest supporting procedural due process, or a constitutional violation by a corrections officer, and that claims against the Department of Corrections and official-capacity damages claims were barred. The court granted limited leave to amend, while dismissing several claims with prejudice.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Matthew W. Brann
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	January 8, 2026
DOCKET	4:25-CV-01680
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights complaint screened under 28 U.S.C. § 1915A. The court dismissed the complaint for failure to state a claim, dismissed specified claims with prejudice, and granted limited leave to amend the remaining claims.
STANDARD OF REVIEW	The court applied the Federal Rule of Civil Procedure 12(b)(6) plausibility standard to screening under 28 U.S.C. § 1915A(b)(1). It accepted well-pleaded factual allegations as true, drew reasonable inferences in the plaintiff's favor, disregarded legal conclusions, and construed the pro se pleading liberally.
PRECEDENTIAL VALUE	unpublished
PARTIES	Waheed Jenkins v. Department of Corrections, Kevin Hall, Je. Shearn, Thomas McGinley

TOPICS

section 1983 prisoners rights motions to dismiss procedural due process eleventh amendment immunity

PRACTICE AREAS

civil rights prisoner civil rights constitutional law civil procedure remedies

QUESTIONS PRESENTED

1. Whether Jenkins plausibly alleged personal involvement by Superintendent McGinley in a constitutional violation.
2. Whether the Pennsylvania Department of Corrections is a person subject to liability under 42 U.S.C. § 1983.
3. Whether Jenkins plausibly alleged deliberate indifference to serious medical needs under the Eighth Amendment against Nurse Hall.
4. Whether official-capacity claims for monetary damages are barred by Eleventh Amendment sovereign immunity.
5. Whether Jenkins alleged a protected liberty interest sufficient to support a Fourteenth Amendment procedural due process claim based on 15 days in the RHU.
6. Whether Jenkins stated a § 1983 claim based on Corrections Officer Shearn's statement to a visitor.

HOLDINGS

1. A § 1983 plaintiff must plead each defendant's personal involvement in the alleged constitutional misconduct; respondeat superior and conclusory allegations of supervisory responsibility are insufficient.
2. The Pennsylvania Department of Corrections is not a person subject to suit under 42 U.S.C. § 1983, and Jenkins's damages claim against it was properly dismissed with prejudice.
3. Jenkins failed to state an Eighth Amendment deliberate-indifference claim against Nurse Hall because alleging negligent medical judgment, without deliberate indifference and resulting harm, does not establish a constitutional violation.
4. Official-capacity claims for monetary damages against Pennsylvania state officials are barred by Eleventh Amendment sovereign immunity.
5. Jenkins failed to state a procedural due process claim based on 15 days in the RHU because he did not identify a protected liberty interest; the claim was dismissed with prejudice.
6. Jenkins failed to state a § 1983 claim against Shearn because informing a visitor that Jenkins was in disciplinary custody for drugs, without identifying a constitutional or federal-law right violated, was insufficient; the claim was dismissed with prejudice.

KEY QUOTATIONS

“Because Jenkins fails to state a claim upon which relief may be granted, the Court will dismiss his complaint pursuant to 28 U.S.C. § 1915A(b)(1) but will grant him leave to amend.”

“To plausibly plead a Section 1983 claim, Jenkins must specify each Defendant’s personal involvement in the alleged constitutional misconduct in order to state a claim against them.”

FACTUAL BACKGROUND

Jenkins was incarcerated at SCI Coal Township when he fell from the top bunk on July 25, 2025, allegedly injuring his head and back. Nurse Kevin Hall responded and administered Narcan because he believed Jenkins had overdosed on heroin. Jenkins was then held in the Restricted Housing Unit for 15 days during a disciplinary investigation until toxicology results were negative. Jenkins alleged that Corrections Officer Je. Shearn later told a visitor that Jenkins was in the RHU for drugs, and he sued the Pennsylvania Department of Corrections, Hall, Shearn, and Superintendent Thomas McGinley for damages.

PROCEDURAL HISTORY

Jenkins filed a September 2025 complaint under 42 U.S.C. § 1983 concerning events at SCI Coal Township. The district court conducted statutory screening under § 1915A(b)(1), concluded that the complaint failed to state a claim, and allowed amendment of claims that might be cured by additional factual allegations while dismissing legally futile claims with prejudice.

DISPOSITION

dismissed

CASES CITED

- Gonzaga University v. Doe, 536 U.S. 273, 284-85 (2002)
- Grayson v. Mayview State Hospital, 293 F.3d 103, 109-10 & n.11, 114 (3d Cir. 2002)
- O'Brien v. U.S. Federal Government, 763 F. App'x 157, 159 & n.5 (3d Cir. 2019) (per curiam)
- Allah v. Seiverling, 229 F.3d 220, 223 (3d Cir. 2000)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Nami v. Fauver, 82 F.3d 63, 66 (3d Cir. 1996)
- Phillips v. County of Allegheny, 515 F.3d 224, 229 (3d Cir. 2008)
- Mayer v. Belichick, 605 F.3d 223, 230 (3d Cir. 2010)
- Pension Benefit Guaranty Corp. v. White Consolidated Industries, 998 F.2d 1192, 1196 (3d Cir. 1993)
- Connelly v. Lane Construction Corp., 809 F.3d 780, 787 (3d Cir. 2016)
- Ashcroft v. Iqbal, 556 U.S. 662, 675-76, 679, 681 (2009)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Lewis v. Wetzel, 153 F. Supp. 3d 678, 696-97 (M.D. Pa. 2015)

- Brooks v. Beard, 167 F. App'x 923, 925 (3d Cir. 2006)
- Alexander v. Gennarini, 144 F. App'x 924, 925 (3d Cir. 2005)
- Rehberg v. Paulk, 566 U.S. 356, 361 (2012)
- Imbler v. Pachtman, 424 U.S. 409, 417 (1976)
- Will v. Michigan Department of State Police, 491 U.S. 58, 64-65, 71 (1989)
- Fischer v. Cahill, 474 F.2d 991, 992 (3d Cir. 1973)
- Slagle v. County of Clarion, 435 F.3d 262, 264 n.3 (3d Cir. 2006)
- Stankowski v. Farley, 487 F. Supp. 2d 543, 554 (M.D. Pa. 2007)
- Foye v. Wexford Health Sources Inc., 675 F. App'x 210, 215 (3d Cir. 2017)
- Harper v. Jeffries, 808 F.2d 281, 284 n.4 (3d Cir. 1986)
- Laskaris v. Thornburgh, 661 F.2d 23, 25 (3d Cir. 1981)
- Durham v. Kelley, 82 F.4th 217, 229 (3d Cir. 2023)
- Natale v. Camden County Correctional Facility, 318 F.3d 575, 582 (3d Cir. 2003)
- Monmouth County Correctional Institution Inmates v. Lanzaro, 834 F.2d 326, 346-47 (3d Cir. 1987)
- Brooks v. Kyler, 204 F.3d 102, 105 n.4 (3d Cir. 2000)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Joh v. Suhey, 709 F. App'x 729, 731 (3d Cir. 2017)
- DeJesus v. Delaware, 833 F. App'x 936, 940 (3d Cir. 2020)
- Westfall v. Luna, 903 F.3d 534, 551 (5th Cir. 2018)
- Sealock v. Colorado, 218 F.3d 1205, 1210 (10th Cir. 2000)
- Kellum v. Mares, 657 F. App'x 763, 771 (10th Cir. 2016)
- Idaho v. Coeur d'Alene Tribe of Idaho, 521 U.S. 261, 267-68 (1997)
- Hans v. Louisiana, 134 U.S. 1, 10 (1890)
- Downey v. Pennsylvania Department of Corrections, 968 F.3d 299, 310 (3d Cir. 2020)
- Betts v. New Castle Youth Development Center, 621 F.3d 249, 254 & n.5 (3d Cir. 2010)
- Wheeling & Lake Erie Railway Co. v. Public Utility Commission of Pennsylvania, 141 F.3d 88, 91 (3d Cir. 1998)
- Wilkinson v. Austin, 545 U.S. 209, 221 (2005)
- Sandin v. Conner, 515 U.S. 472, 484, 486 (1995)
- Smith v. Mensinger, 293 F.3d 641, 654 (3d Cir. 2002)
- Torres v. Fauver, 292 F.3d 141, 151 (3d Cir. 2002)
- Griffin v. Vaughn, 112 F.3d 703, 705-07 (3d Cir. 1997)
- Dunbar v. Barone, 487 F. App'x 721, 725 (3d Cir. 2012)