

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, FORT MYERS DIVISION

Francisco Rodriguez Santa v. M. McKinney, T. Quegan, and J.
Marshall

Rodriguez Santa v. McKinney · No. 2:25-cv-1139-KCD-DNF · Decided February 23, 2026

SUMMARY

The United States District Court for the Middle District of Florida dismisses a prisoner’s 42 U.S.C. § 1983 complaint alleging that prison officials violated the Fourteenth Amendment during disciplinary proceedings. The court concludes that the plaintiff’s 17-day confinement and temporarily revoked, but later restored, gain-time credits did not constitute an atypical and significant deprivation implicating a protected liberty interest. The action is dismissed without prejudice for failure to state a claim, and the court determines that amendment would be futile.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Fort Myers Division
WRITING FOR THE COURT	Kyle C. Dudek
JURISDICTION	United States District Court for the Middle District of Florida, Fort Myers Division
DECIDED	February 23, 2026
DOCKET	2:25-cv-1139-KCD-DNF
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 screened under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A; complaint dismissed without prejudice for failure to state a claim.
STANDARD OF REVIEW	The court applied the Rule 12(b)(6) failure-to-state-a-claim standard to screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, accepting the factual allegations as true and assessing whether they plausibly stated a claim.
PRECEDENTIAL VALUE	Unknown; federal district court screening order with no reporter citation or stated precedential designation.
PARTIES	Francisco Rodriguez Santa v. M. McKinney, T. Quegan, J. Marshall

TOPICS

due process prisoners rights section 1983 pleadings civil procedure

PRACTICE AREAS

prisoner civil rights constitutional law civil procedure remedies

QUESTIONS PRESENTED

1. Whether Plaintiff plausibly alleged that the disciplinary proceedings deprived him of a constitutionally protected liberty interest under the Fourteenth Amendment.
2. Whether the alleged failure to provide advance notice and an adequate opportunity to prepare for the disciplinary hearing stated a due-process claim despite the later administrative reversal and restoration of gain-time credit.
3. Whether the complaint should be dismissed at initial screening for failure to state a claim and whether amendment would be futile.

HOLDINGS

1. A 17-day period of administrative confinement, together with a gain-time deprivation that was completely restored, did not constitute an atypical and significant deprivation sufficient to trigger procedural due-process protection under the Fourteenth Amendment.
2. Even assuming Plaintiff lacked advance notice of the disciplinary hearing and could not properly prepare a defense, the alleged procedural defects did not state a due-process claim because the disciplinary sanction did not deprive him of a constitutionally protected liberty interest.
3. The complaint failed to state a plausible Fourteenth Amendment due-process claim and was dismissed without prejudice under 28 U.S.C. § 1915(e)(2)(B)(ii).

KEY QUOTATIONS

“A short term of segregation rarely implicates a liberty interest protected by the Due Process Clause.”
(Discussion section)

“Simply put, the sanction imposed on Plaintiff did not implicate problematic due process concerns.”
(Discussion section)

“Because Plaintiff does not plausibly allege that he was deprived of a constitutionally protected liberty interest, he does not state a claim under the Fourteenth Amendment’s Due Process Clause.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged that he experienced a psychological emergency at Florida State Prison on June 11, 2025, was placed under psychological observation, and was later transferred to Charlotte Correctional Institution. He was subsequently found guilty at a disciplinary hearing of possessing a homemade edged weapon and was sentenced to 60 days of confinement with 60 days of gain-time credit revoked. On administrative appeal, the Warden

overturned the disciplinary report, restored the gain time, and released Plaintiff from confinement; Plaintiff alleged that the disciplinary process violated due process.

PROCEDURAL HISTORY

Plaintiff, a Florida prisoner proceeding pro se, filed a § 1983 complaint and moved to proceed in forma pauperis. During initial screening, the court considered allegations concerning a disciplinary report, disciplinary hearing, temporary confinement, and temporary loss of gain-time credit. The court dismissed the complaint without prejudice, directed the Clerk to terminate pending motions and close the case, and concluded that amendment would be futile.

DISPOSITION

dismissed

CASES CITED

- Mitchell v. Farcass, 112 F.3d 1483 (11th Cir. 1997)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Davis v. Kvalheim, 261 F. App'x 231 (11th Cir. 2008)
- Wolff v. McDonnell, 418 U.S. 539 (1974)
- Sandin v. Conner, 515 U.S. 472 (1995)
- Wilkinson v. Austin, 545 U.S. 209 (2005)
- Smith v. Deemer, 641 F. App'x 865 (11th Cir. 2016)
- Rodgers v. Singletary, 142 F.3d 1252 (11th Cir. 1998)
- Woodson v. Whitehead, 673 F. App'x 931 (11th Cir. 2016)
- Al-Amin v. Donald, 165 F. App'x 733 (11th Cir. 2006)
- Cornelius v. Bank of America, NA, 585 F. App'x 996 (11th Cir. 2014)