

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, ROCK ISLAND DIVISION

John Crampton, III v. Samuel Little, Tom Wiley, and Eric
Dusenberry

Crampton v. Little, No. 4:24-cv-04156-SLD-RLH (C.D. Ill. Apr. 21, 2026) · No. 4:24-cv-04156-SLD-RLH ·
Decided April 21, 2026

SUMMARY

The United States District Court for the Central District of Illinois rules on police officers’ motion for summary judgment in John Crampton III’s § 1983 action alleging false arrest and excessive force. The court grants summary judgment on the false-arrest claim based on qualified immunity but denies summary judgment on the excessive-force claim because material factual disputes remain concerning Crampton’s resistance, medical condition, handcuffing, and the officers’ use of force. The court also finds that a jury could determine whether an officer present at the scene had a realistic opportunity to intervene.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Rock Island Division
WRITING FOR THE COURT	Sara Darrow
JURISDICTION	United States District Court for the Central District of Illinois, Rock Island Division
DECIDED	April 21, 2026
DOCKET	4:24-cv-04156-SLD-RLH
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment on the plaintiff's claims under 42 U.S.C. § 1983 alleging false arrest and excessive force. The court granted summary judgment in part on the false-arrest claim based on qualified immunity and denied it in part on the excessive-force claim.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court construes disputed facts and draws reasonable inferences in favor of the nonmoving party, without weighing evidence

	or deciding credibility. Qualified immunity requires consideration of whether the defendant violated a constitutional right and whether that right was clearly established.
PRECEDENTIAL VALUE	unpublished
PARTIES	John Crampton, III v. Samuel Little, Tom Wiley, Eric Dusenberry

TOPICS

section 1983 police misconduct qualified immunity summary judgment civil rights

PRACTICE AREAS

civil rights constitutional law civil procedure police misconduct torts

QUESTIONS PRESENTED

1. Whether the officers were entitled to summary judgment and qualified immunity on Crampton's claim that he was arrested without probable cause.
2. Whether disputed facts concerning Crampton's compliance, resistance, threats to officer safety, reported shoulder injuries, and the manner of handcuffing precluded summary judgment on his excessive-force claim.
3. Whether Officer Wiley was entitled to summary judgment and qualified immunity on Crampton's failure-to-intervene theory.
4. Whether the absence of expert medical testimony required summary judgment on causation and damages.

HOLDINGS

1. The officers were entitled to qualified immunity on Crampton's false-arrest claim because, even assuming the more demanding probable-cause standard applied, it was not clearly established that arresting Crampton for battery after the truck door struck an officer violated the Fourth Amendment.
2. Summary judgment was inappropriate on the excessive-force claim because, viewing the evidence in Crampton's favor, a reasonable jury could find that the officers used force greater than reasonably necessary by forcibly removing and handcuffing a compliant individual, ignoring his report of preexisting shoulder injuries, and yanking his arms upward.
3. Officer Wiley was not entitled to summary judgment or qualified immunity because a reasonable jury could find that he had a realistic opportunity to intervene in the alleged excessive force but failed to do so.
4. The absence of expert medical testimony did not warrant summary judgment because physical injury is not an element of an excessive-force claim and a lay jury could infer causation from the alleged force, the localized symptoms, the timing of medical treatment, and Crampton's testimony.

KEY QUOTATIONS

“A police officer’s use of force is unconstitutional if, judging from the totality of circumstances at the time of the arrest, the officer used greater force than was reasonably necessary to make the arrest.” (Excessive Force section)

“injury is not an element of an excessive- force claim.” (Causation section)

FACTUAL BACKGROUND

Police officers responded to a report that an intoxicated man was attempting to leave a bar in a red Ford F-350, where they encountered Crampton as a passenger. The parties disputed whether Crampton resisted or disobeyed orders and whether he informed the officers that he had shoulder problems and requested front handcuffing. Crampton alleged that officers forcibly removed him, pulled his arms behind his back, and raised them despite his reported injuries, after which he sought medical treatment for wrist, elbow, arm, and shoulder problems. A state resisting-a-peace-officer charge was later dismissed because there was no underlying offense supporting the arrest.

PROCEDURAL HISTORY

Crampton filed a two-count complaint alleging a Fourth Amendment violation and an Illinois battery claim. The court dismissed the battery claim as barred by Illinois's one-year statute of limitations. After discovery, the defendants moved for summary judgment, arguing that no constitutional violation occurred, that qualified immunity applied, and that Crampton could not establish causation. The court granted the motion as to the false-arrest claim but denied it as to the excessive-force claim.

DISPOSITION

other

CASES CITED

- Payne v. Pauley, 337 F.3d 767 (7th Cir. 2003)
- McCann v. Iroquois Mem'l Hosp., 622 F.3d 745 (7th Cir. 2010)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242 (1986)
- Pipitone v. United States, 180 F.3d 859 (7th Cir. 1999)
- Coleman v. Donahoe, 667 F.3d 835 (7th Cir. 2012)
- Foley v. City of Lafayette, 359 F.3d 925 (7th Cir. 2004)
- United States v. Odum, 72 F.3d 1279 (7th Cir. 1995)
- United States v. Johnson, 910 F.2d 1506 (7th Cir. 1990)
- Wolf v. Colorado, 338 U.S. 25 (1949)
- Mapp v. Ohio, 367 U.S. 643 (1961)
- Hall v. City of Chicago, 953 F.3d 945 (7th Cir. 2020)
- Terry v. Ohio, 392 U.S. 1 (1968)

- Thompson v. Wagner, 319 F.3d 931 (7th Cir. 2003)
- Moorer v. City of Chicago, 92 F.4th 715 (7th Cir. 2024)
- Illinois v. Gates, 462 U.S. 213 (1983)
- Harlow v. Fitzgerald, 457 U.S. 800 (1982)
- Ashcroft v. al-Kidd, 563 U.S. 731 (2011)
- Garcia v. Posewitz, 79 F.4th 874 (7th Cir. 2023)
- Findlay v. Lendermon, 722 F.3d 895 (7th Cir. 2013)
- Jackson v. Parker, 627 F.3d 634 (7th Cir. 2010)
- United States v. Ienco, 182 F.3d 517 (7th Cir. 1999)
- Graham v. Connor, 490 U.S. 386 (1989)
- Rooni v. Biser, 742 F.3d 737 (7th Cir. 2014)
- Stainback v. Dixon, 569 F.3d 767 (7th Cir. 2009)
- Thompson v. Boggs, 33 F.3d 847 (7th Cir. 1994)
- Gaudreault v. Mun. of Salem, 923 F.2d 203 (1st Cir. 1991)
- Miller v. Gonzalez, 761 F.3d 822 (7th Cir. 2014)
- Kirkwood v. DeLong, 683 F. Supp. 2d 823 (N.D. Ind. 2010)
- Abdullahi v. City of Madison, 423 F.3d 763 (7th Cir. 2005)
- McAllister v. Price, 615 F.3d 877 (7th Cir. 2010)
- Taylor v. City of Milford, 10 F.4th 800 (7th Cir. 2021)
- Myers v. Ill. Cent. R.R. Co., 629 F.3d 639 (7th Cir. 2010)
- Higgins v. Koch Dev. Corp., 794 F.3d 697 (7th Cir. 2015)
- Cyrus v. Town of Mukwonago, 624 F.3d 856 (7th Cir. 2010)
- Holmes v. Village of Hoffman Estates, 511 F.3d 673 (7th Cir. 2007)
- Tufariello v. Long Island R. Co., 458 F.3d 80 (2d Cir. 2006)