

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

Alberto Ruiz v. Tyrone L. Baker

Ruiz · No. 26-4030 · Decided June 16, 2026

SUMMARY

The court conducted a merit review under 28 U.S.C. § 1915A of Alberto Ruiz’s pro se § 1983 claims concerning extreme heat in his prison cell and the denial of permission to purchase a fan. The court dismissed the complaint for failure to state a claim, finding insufficient allegations that Warden Tyrone L. Baker was personally involved or deliberately indifferent to a serious risk of harm, but granted leave to amend within 30 days. The court also denied Ruiz’s motion for appointed counsel with leave to renew.

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	June 16, 2026
DOCKET	26-4030
DISPOSITION	dismissed
PROCEDURAL POSTURE	Merit review of a pro se incarcerated plaintiff’s complaint under 28 U.S.C. § 1915A; the court dismissed the complaint for failure to state a claim, granted leave to amend, and denied the motion for appointment of counsel with leave to renew.
STANDARD OF REVIEW	At § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff’s favor, but conclusory statements and labels do not suffice; the complaint must state a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court merit review order
PARTIES	Alberto Ruiz v. Tyrone L. Baker

TOPICS

prisoners rights

cruel and unusual punishment

section 1983

motions to dismiss

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated an Eighth Amendment conditions-of-confinement claim against Warden Baker under 28 U.S.C. § 1915A.
2. Whether Ruiz was entitled to appointment of counsel at that stage of the case.

HOLDINGS

1. The complaint failed to state a claim because, even assuming the heat constituted an objectively serious deprivation, it did not allege sufficient facts showing that Baker was personally involved in denying Ruiz a fan or acted with deliberate indifference to a substantial risk of serious harm.
2. Appointment of counsel was not warranted because Ruiz had made a reasonable effort to obtain counsel but appeared competent to litigate the case himself, which did not appear overly complex or likely to require expert testimony.

KEY QUOTATIONS

“A claim is legally insufficient if it “(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.””

“A prison official acts with deliberate indifference when “the official knows of and disregards an excessive risk to inmate health or safety; the official must both be aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference.””

FACTUAL BACKGROUND

Ruiz, incarcerated at Western Illinois Correctional Center, alleged that he experienced extreme heat in his cell and wrote two letters to Warden Baker seeking permission to purchase a fan under a purported Warden's Bulletin. He also alleged that he filed grievances and, in late June 2024, became dizzy while climbing down from a top bunk, fell, cut his head, and required five staples. The court found that the allegations did not plausibly establish Baker's personal involvement in denying the fan or that Baker knew of and disregarded a substantial risk of serious harm.

PROCEDURAL HISTORY

Ruiz was granted leave to proceed in forma pauperis and filed a prisoner civil-rights complaint against Warden Tyrone L. Baker concerning extreme cell heat, denial of permission to purchase a fan, and injuries sustained after falling from a bunk. On merit review, the court found that the complaint did not plausibly allege Baker's personal involvement or deliberate indifference. The court dismissed the complaint under Federal Rule of Civil Procedure 12(b)(6) and § 1915A, granted 30 days to amend, and denied Ruiz's motion for counsel with leave to renew.

DISPOSITION

dismissed

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. U.S., 721 F.3d 418, 422 (7th Cir. 2013)
- Townsend v. Fuchs, 522 F.3d 765, 773 (7th Cir. 2008)
- Farmer v. Brennan, 511 U.S. 825, 834 (1994)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)
- Dixon v. Godinez, 114 F.3d 640, 642 (7th Cir. 1997)
- Pruitt v. Mote, 503 F.3d 647, 654-55 (7th Cir. 2007)