

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA

Michael-Tyrone Sturghiss v. Ronald Dinsmore LLC, Logan
McTarnsey, Jacob Lightsey, and Greenwood City Police

Sturghiss · No. 1:25-cv-01953-TWP-KMB · Decided April 20, 2026

SUMMARY

The United States District Court for the Southern District of Indiana grants the defendants’ motion for judgment on the pleadings without prejudice in a pro se civil-rights action arising from a traffic stop, detention, arrest, and alleged use of excessive force. The court disregards sovereign-citizen theories but concludes that the plaintiff plausibly alleged unlawful detention, excessive force, assault, and battery. Because the complaint does not specify each individual defendant’s conduct, the plaintiff is given until May 14, 2026, to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana
WRITING FOR THE COURT	Tanya Walton Pratt
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	April 20, 2026
DOCKET	1:25-cv-01953-TWP-KMB
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c). The court granted the motion without prejudice, dismissed the complaint subject to amendment, and granted plaintiff leave to file an amended complaint identifying each individual defendant's alleged conduct.
STANDARD OF REVIEW	A Rule 12(c) motion is analyzed under the same standard as a Rule 12(b)(6) motion. The court accepts well-pleaded factual allegations as true, draws reasonable inferences in favor of the nonmoving party, and may grant judgment only when the plaintiff cannot prove facts supporting relief. Unsupported legal conclusions and allegations contradicted by the complaint need not be accepted.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order

TOPICS

motion for judgment on the pleadings

section 1983

police misconduct

civil rights

assault

PRACTICE AREAS

civil procedure

civil rights

constitutional law

torts

QUESTIONS PRESENTED

1. Whether defendants were entitled to judgment on the pleadings because the complaint relied in part on discredited sovereign-citizen theories.
2. Whether the complaint adequately pleaded unlawful detention, false arrest, excessive force, and state-law assault and battery claims at the Rule 12(c) stage.
3. Whether the complaint stated claims against the individual defendants when it did not allege each defendant's personal involvement or specific misconduct.
4. Whether plaintiff should be granted leave to amend before dismissal with prejudice.

HOLDINGS

1. The court disregarded arguments based on sovereign-citizen theories but did not dismiss all claims solely because those theories appeared in the complaint; non-sovereign factual theories were construed and evaluated separately.
2. Accepting the allegations as true and construing the pro se complaint liberally, plaintiff adequately pleaded that he was detained or arrested without reasonable suspicion or probable cause, that officers used excessive force, and that defendants committed state-law assault and battery.
3. The complaint failed to state claims against the individual defendants because it did not allege which defendant participated in the excessive force or battery and did not attribute specific misconduct to any named defendant.
4. The court granted plaintiff an opportunity to amend because amendment was not shown to be futile and the action was at an early stage.

KEY QUOTATIONS

“Regardless of an individual’s claimed status of descent, be it as a “sovereign citizen,” ...that person is not beyond the jurisdiction of the courts.” (III)

“Determining whether an officer's use of force is reasonable depends on the totality of the circumstances, “including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether [he] is actively resisting arrest or attempting to evade arrest by flight.”” (III)

“For the foregoing reasons, the Defendants’ Motion for Judgment on the Pleadings (Dkt. 15), is GRANTED but without prejudice.” (V)

FACTUAL BACKGROUND

Sturghiss alleged that officers stopped his vehicle for a minor traffic infraction involving a license plate, detained and arrested him without reasonable suspicion or probable cause, and used unnecessary force by drawing weapons, holding him at gunpoint, forcibly removing him from the vehicle, seizing his phone, and handcuffing him. He alleged that he was not resisting or posing a danger and that his vehicle was seized and not returned. The complaint asserted unlawful stop and detention, excessive force, and state-law assault and battery claims, but did not identify which individual defendant performed which acts.

PROCEDURAL HISTORY

Sturghiss filed a pro se civil-rights action on September 26, 2025, arising from a traffic stop, detention, arrest, and alleged use of force. The court screened the complaint, dismissed the Monell claim against Greenwood City Police and interstate-abduction claims, and allowed Fourth Amendment and state-law claims to proceed. After defendants answered, they moved for judgment on the pleadings. The court found that some claims were adequately pleaded but that the complaint failed to allege personal involvement by any individual defendant, granted the motion without prejudice, and allowed amendment through May 14, 2026.

DISPOSITION

other

CASES CITED

- Emergency Services Billing Corp. v. Allstate Insurance Co., 668 F.3d 459, 464 (7th Cir. 2012)
- Pisciotta v. Old National Bancorp, 499 F.3d 629, 633 (7th Cir. 2007)
- Frey v. Bank One, 91 F.3d 45, 46 (7th Cir. 1996)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Hecker v. Deere & Co., 556 F.3d 575, 580 (7th Cir. 2009)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- N. Indiana Gun & Outdoor Shows, Inc. v. City of South Bend, 163 F.3d 449, 452 (7th Cir. 1998)
- Craigs, Inc. v. General Electric Capital Corp., 12 F.3d 686, 688 (7th Cir. 1993)
- R.J.R. Services, Inc. v. Aetna Casualty & Surety Co., 895 F.2d 279, 281 (7th Cir. 1990)
- United States v. Benabe, 654 F.3d 753, 767 (7th Cir. 2011)
- Bey v. State of Indiana, 847 F.3d 559, 559-60 (7th Cir. 2017)
- Graham v. Connor, 490 U.S. 386, 395-96 (1989)
- Colbert v. City of Chicago, 851 F.3d 649, 657 (7th Cir. 2017)
- Gonzalez v. McHenry County, Illinois, 40 F.4th 824, 828 (7th Cir. 2022)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Tate v. SCR Medical Transportation, 809 F.3d 343, 346 (7th Cir. 2016)
- Luevano v. Wal-Mart, 722 F.3d 1014 (7th Cir. 2013)

OPINION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS
DIVISION MICHAEL-TYRONE STURGHISS)) Plaintiff,)) v.)) Case No. 1:25-cv-01953-
TWP-KMB RONALD DINSMORE LLC,) LOGAN MCTARNSEY,) JACOB LIGHTSEY, and)
GREENWOOD CITY POLICE,)) Defendants.)) ORDER ON MOTION FOR JUDGMENT ON
THE PLEADINGS This matter is before the Court on Defendants Ronald Densmore, Logan
McTarnsey, and Jacob Lightsey ("together, Defendants") Motion for Judgment on the Pleadings
filed pursuant to Federal Rule of Civil Procedure 12(c) (Dkt.

15). Pro se Plaintiff Michael-Tyrone Sturghiss ("Sturghiss") initiated this action against the
Defendants alleging violations of his civil rights (Dkt. 1). The Court screened the Complaint and
dismissed several claims, and Sturghiss' constitutional and tort claims against the Defendants were
allowed to proceed.

For the following reasons, the Motion for Judgment on the Pleadings is granted, but without
prejudice. I. BACKGROUND The following facts are not necessarily objectively true, but as
required when reviewing a motion for judgment on the pleadings, the Court accepts as true the
factual allegations in the Complaint and draws all inferences in favor of Sturghiss as the non-
moving party.

See *Emergency Servs. Billing Corp. v. Allstate Ins. Co.*, 668 F.3d 459, 464 (7th Cir. 2012). On
July 25, 2025, Sturghiss was driving a Nissan Murano when he was pulled over for a minor traffic
infraction (Dkt. 1 at 5). At the time of the stop, Sturghiss' Nissan displayed the license plate
pictured below. | ae Peete am The Defendants told Sturghiss that the US DOT numbers on his
license plate came back as nothing. /d.

Sturghiss alleges the three police officers (acting under color of law), unlawfully stopped and
detained him for a minor traffic infraction, without reasonable suspicion or probable cause, and
without issuing clear lawful justification. He was then detained without reasonable suspicion or
probable cause, and the Defendant Officers used unnecessary force. /d.

He was placed in a position of heightened risk by the officers drawing and aiming weapons
(gunpoint) at him, despite no threats being posed by Sturghiss and even though he was not
resisting or posing any danger. /d. Sturghiss was arrested but not given a reason for his arrest at the
time. /d. at 7.

On September 26, 2025 Sturghiss initiated this action. In his caption, he lists himself as Michael-
Tyrone Sturghiss, pro se, sui juris Claimant, Plaintiff. (Dkt. 1). The Court screened the Complaint
and the following claims remain pending against Defendants: Count I-Unlawful Stop and
Detention (Fourth Amendment) Count II-Excessive Force (Fourth Amendment) Count V-Assault,
Battery (state law claims) (Dkt.

1 at 9, 11). | The Court dismissed the Monell claim against the Greenwood City Police (Count IV) and the interstate abduction claims. (Dkt. 9 at 4). On December 18, 2025 Defendants filed their Answer to the Complaint (Dkt. 14) as well as the instant Motion for Judgment on the Pleadings (Dkt. 15). Sturghiss filed a Response to Defendant's Assertions on January 11, 2026 (Dkt.

17), which the Court discerns to be his response to the motion for judgment on the pleadings. II. LEGAL STANDARD Federal Rule of Civil Procedure 12(c) permits a party to move for judgment after the parties have filed a complaint and an answer, and the pleadings are closed. Rule 12(c) motions are analyzed under the same standard as a motion to dismiss under Rule 12(b)(6).

Pisciotta v. Old Nat'l Bancorp., 499 F.3d 629, 633 (7th Cir. 2007); Frey v. Bank One, 91 F.3d 45, 46 (7th Cir. 1996). The complaint must allege facts that are "enough to raise a right to relief above the speculative level." Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007).

Although "detailed factual allegations" are not required, mere "labels," "conclusions," or "formulaic recitation[s] of the elements of a cause of action" are insufficient. *Id.* Stated differently, the complaint must include "enough facts to state a claim to relief that is plausible on its face." *Hecker v. Deere & Co.*, 556 F.3d 575, 580 (7th Cir. 2009) (internal citation and quotation marks omitted).

To be facially plausible, the complaint must allow "the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (citing *Twombly*, 550 U.S. at 556). Like a Rule 12(b)(6) motion, the Court will grant a Rule 12(c) motion only if "it appears beyond doubt that the plaintiff cannot prove any facts that would support his claim for relief."

N. Ind. Gun & Outdoor Shows, Inc. v. City of S. Bend, 163 F.3d 449, 452 (7th Cir. 1998) (quoting *Craigs, Inc. v. Gen. Elec. Capital Corp.*, 12 F.3d 686, 688 (7th Cir. 1993)). The factual allegations in the complaint are viewed in a light most favorable to the non-moving party; however, the Court is "not obliged to ignore any facts set forth in the complaint that undermine the plaintiff's claim or to assign any weight to unsupported conclusions of law."

Id. (quoting *R.J.R. Serv., Inc. v. Aetna Cas. & Sur. Co.*, 895 F.2d 279, 281 (7th Cir. 1989)). "As the title of the rule implies, Rule 12(c) permits a judgment based on the pleadings alone.... The pleadings include the complaint, the answer, and any written instruments attached as exhibits." *Id.* (internal citations omitted). III. DISCUSSION In their Motion for Judgment on the Pleadings, Defendants assert that Sturghiss' claims are based upon fictitious legal conclusions he pled as facts: that his "USDOT" license plate is valid, and thus an improper basis for a traffic stop, and that he is a "Non-US Citizen" on a "Do Not Detain List." (Dkt.

16 at 5). Defendants argue Sovereign citizen theories, such as those in Sturghiss' Complaint, have been universally rejected as frivolous. *United States v. Benabe*, 654 F.3d 753, 767 (7th Cir. 2011)

(“Regardless of an individual’s claimed status of descent, be it as a “sovereign citizen,” ...that person is not beyond the jurisdiction of the courts. These theories should be rejected summarily; however they are presented.”) Defendants point out that Sturghiss' choice to flout the law by displaying a fictitious license plate, inevitably led to an encounter with law enforcement.

They argue that the lawsuit that follows "where Plaintiff seeks redress in any and all forms the law allows" attempts to pervert the justice system. Because Sturghiss' claims are premised upon sovereign citizen theories, Defendants ask the Court to dismiss his lawsuit, with prejudice, at the Rule 12 stage. *Id.* at 6. Defendants are correct in their assertion that portions of Sturghiss' Complaint rely on “sovereign citizen” theories of law challenging the legitimacy of federal, state, and local governments that have long been discredited.

See, e.g., *Bey v. State of Indiana*, 847 F.3d 559, 559– 60 (7th Cir. 2017). But not all of Sturghiss' claims rely on sovereign theories. Accordingly, the Court will disregard any of his arguments based on sovereign citizen theories when analyzing the motion for judgment on the pleadings, and his non-sovereign theories will be construed. Accepting his factual allegations as true at the pleading stage, and liberally construing his pro se Complaint, Sturghiss' claims that he was detained without reasonable suspicion or probable cause, and that the Officers used unnecessary force when they drew and aimed their weapons at Sturghiss, even though he was not resisting or posing any danger, survive a judgment on the pleadings.

Id. Excessive force claims arising under § 1983 are analyzed under the Fourth Amendment's “objective reasonableness” standard. *Graham v. Connor*, 490 U.S. 386, 395 (1989). Determining whether an officer's use of force is reasonable depends on the totality of the circumstances, “including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether [he] is actively resisting arrest or attempting to evade arrest by flight.” *Id.* at 396.

Here, Sturghiss alleges that he was being arrested for a fraudulent license plate, not a violent offense and he asserts that he did not resist arrest. And in his Response brief, Sturghiss makes factual allegations that he was held at gunpoint by the Defendants, including one officer who pointed a firearm less than two feet from his head while another forcibly grabbed his wrist and removed him from his automobile, seized his phone and handcuffed him without probable cause.

(Dkt. 17 at 2). He alleges that he was jailed for over two months and his automobile seized and never returned. *Id.* Based on the allegations in his complaint, Sturghiss has adequately pled that he was falsely arrested and that officers used excessive force.

In addition, he has adequately pled state law claims of assault and battery. However, while Sturghiss may have a claim related to excessive force under the Fourteenth Amendment and state law claims for assault and battery, he has not named which individual defendants participated in

the excessive force and battery. Likewise, he has not alleged any misconduct by any individual defendant that he named. "[I]ndividual liability under § 1983... requires personal involvement in the alleged constitutional deprivation."

Colbert v. City of Chicago, 851 F.3d 649, 657 (7th Cir. 2017) (internal quotation omitted). "The plaintiff must demonstrate a causal connection between (1) the sued officials and (2) the alleged misconduct." *Id.* In addition, for a public official to be individually liable for a subordinate's constitutional violation, the official must both "(1) know about the conduct and (2) facilitate, approve, condone, or turn a blind eye toward it."

Gonzalez v. McHenry County, Ill., 40 F.4th 824, 828 (7th Cir. 2022). So although Sturghiss has adequately alleged some of his claims, his Complaint fails to state any factual allegations against any individual defendant.

Accordingly, judgment on the pleadings is granted and Sturghiss' Complaint is subject to dismissal, but Sturghiss is granted an opportunity to file an amended complaint with more specificity as to which officer did what. IV. OPPORTUNITY TO FILE AN AMENDED COMPLAINT The dismissal of the complaint will not in this instance lead to the dismissal of the action at present.

"The usual standard in civil cases is to allow defective pleadings to be corrected, especially in early stages, at least where amendment would not be futile." *Abu-Shawish v. United States*, 898 F.3d 726, 738 (7th Cir. 2018).

In the interest of justice, the Court will allow Sturghiss to amend his complaint if, after reviewing this Court's order, he believes that he can state a viable claim for relief, consistent with the allegations he has already made. See *Tate v. SCR Med. Transp.*, 809 F.3d 343, 346 (7th Cir. 2015) ("We've often said that before dismissing a case under 28 U.S.C. § 1915(e)(2)(B)(ii) a judge should give the litigant, especially a pro se litigant, an opportunity to amend his complaint."); *Luevano v. Wal-Mart*, 722 F.3d 1014 (7th Cir.

2013). Sturghiss shall have through May 14, 2026, to file an Amended Complaint. V. CONCLUSION For the foregoing reasons, the Defendants' Motion for Judgment on the Pleadings (Dkt. 15), is GRANTED but without prejudice. Sturghiss is granted leave through May 14, 2026 to file an Amended Complaint to sufficiently allege factual support in the pleadings in the action against the individual officers.

If nothing is filed, the dismissal will convert to one with prejudice and his claims will be dismissed with prejudice. The Clerk is directed to send a form Complaint with Sturghiss copy of this order. SO ORDERED. Date: 4/20/2026 O Watton ath Hon. Tanya Walton Pratt, Judge United States District Court Southern District of Indiana Distribution: MICHAEL-TYRONE STURGHISS 1695

Farm Meadow Dr. Greenwood, IN 46143 Daniel Mark Witte TRAVELERS STAFF COUNSEL
INDIANA dwitte@travelers.com

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-southern-district-of-in/2026/michael-tyrone-sturghiss-v-ronald-dinsmore-llc-logan-tmgwb328>