

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
DAKOTA, SOUTHERN DIVISION

**Randall William Church Cornett v. Donna (Mental Health), Mental
Health Counselor at Minnehaha County Jail, Individual and Official
Capacity; Sheriff Milstead, Management at Minnehaha County Jail,
Official Capacity; Correctional Medical Management at Minnehaha
County Jail, Official Capacity; and Anthony Helland, Director of
Operations at Minnehaha County Jail, Individual and Official
Capacity**

No. 4:25-CV-04162-ECS (D.S.D. Apr. 29, 2026) · No. 4:25-CV-04162-ECS · Decided April 29, 2026

SUMMARY

The United States District Court for the District of South Dakota grants Randall William Church Cornett leave to proceed in forma pauperis and conducts screening under 28 U.S.C. § 1915A. The court dismisses without prejudice claims against Correctional Medical Management and certain official-capacity claims, as well as requests for dismissal of criminal charges, payment of fines and costs, and termination of an employee. The Fourteenth Amendment deliberate-indifference claims against Donna and Anthony Helland in specified capacities survive screening, while the document’s excerpt ends during analysis of the failure-to-protect claim.

CASE DETAILS

COURT	United States District Court for the District of South Dakota, Southern Division
JURISDICTION	United States District Court for the District of South Dakota, Southern Division
DECIDED	April 29, 2026
DOCKET	4:25-CV-04162-ECS
DISPOSITION	other
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983; the court adjudicated plaintiff’s motion to proceed in forma pauperis, screened the complaint under 28 U.S.C. § 1915A, and considered a motion for appointment of counsel.

STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915A, the court accepted well-pleaded facts as true, liberally construed the pro se complaint, and determined whether it was frivolous, malicious, failed to state a claim, or sought relief from an immune defendant. The court applied the Rule 12(b)(6)-type plausibility standard and required factual allegations supporting each material element.
PRECEDENTIAL VALUE	Unpublished district-court screening order; persuasive value only.
PARTIES	Randall William Church Cornett v. Donna (Mental Health), Mental Health Counselor at Minnehaha County Jail, Sheriff Milstead, Management at Minnehaha County Jail, Correctional Medical Management at Minnehaha County Jail, Anthony Helland, Director of Operations at Minnehaha County Jail

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QUESTIONS PRESENTED

1. Whether Cornett should be granted leave to proceed in forma pauperis and have the initial partial filing fee waived under the Prison Litigation Reform Act.
2. Whether the complaint plausibly alleged a Fourteenth Amendment deliberate-indifference claim for inadequate mental-health care against Donna and Helland.
3. Whether the complaint stated a § 1983 claim against Correctional Medical Management or against Donna and Helland in their official capacities based on an unconstitutional policy or custom.
4. Whether the complaint stated an official-capacity municipal-liability or failure-to-protect claim against Sheriff Milstead and Minnehaha County.
5. Whether the court had authority in this § 1983 action to dismiss state criminal charges, forgive or pay fines and costs, or order an employee terminated.
6. Whether appointment of counsel was warranted for this pro se civil action.

HOLDINGS

1. A prisoner may proceed in forma pauperis while remaining responsible for the full filing fee, and the court may waive the initial partial filing fee when the prisoner has no assets or means to pay it.
2. A pretrial detainee's inadequate-medical-care claim is analyzed under the Fourteenth Amendment, using the same deliberate-indifference standard applicable to Eighth Amendment claims when the governing

circuit has not established a different standard; Cornett plausibly stated such a claim against Donna and Helland at the screening stage.

3. Correctional Medical Management and employees sued in their official capacities cannot be held liable under § 1983 solely for the acts of employees; the complaint must allege an unconstitutional policy, custom, or official action causing the injury.
4. The complaint did not state an official-capacity failure-to-protect or municipal-liability claim against Sheriff Milstead because it did not allege that a county policy, custom, policymaker decision, or deliberately indifferent training practice caused the alleged failure to intervene.
5. The court lacked authority in this § 1983 action to dismiss pending state criminal charges, forgive or pay related fines and costs, or terminate a county employee; prospective relief concerning medical care could potentially be available if constitutional violations and statutory prerequisites were established. Appointment of counsel was unwarranted at the screening stage.

KEY QUOTATIONS

“To be liable for deliberately disregarding medical needs, “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.”” (Section II.C.1.c)

“A plaintiff must allege facts demonstrating the existence of a “continuing, widespread, persistent pattern” of unconstitutional conduct to state a plausible claim for liability based on custom.” (Section II.C.2)

FACTUAL BACKGROUND

Cornett alleged that he submitted twelve requests for emergency mental-health assistance over approximately three weeks, but his requests were disregarded. He alleged that Donna responded by warning him about his language, that Helland denied access to an official psychiatrist and required a four-to-six-week wait, and that Cornett subsequently attempted suicide by hanging himself from a jail rail. He also alleged that unidentified jailers failed to intervene after another inmate reported the suicide attempt. The court found the allegations sufficient at screening to support deliberate-indifference claims against Donna and Helland, but insufficient to establish municipal, corporate, supervisory, or failure-to-protect liability against the other defendants.

PROCEDURAL HISTORY

Cornett, an inmate at the Minnehaha County Jail, filed a § 1983 complaint alleging inadequate mental-health care and failure to protect him during a suicide attempt. He moved to proceed in forma pauperis and for appointment of counsel. The court granted pauper status, waived the initial partial filing fee, denied appointed counsel, dismissed most claims without prejudice, and allowed deliberate-indifference claims against Donna and Helland to proceed in specified capacities.

DISPOSITION

other

CASES CITED

- Henderson v. Norris, 129 F.3d 481, 483 (8th Cir. 1997) (per curiam)
- McGore v. Wrigglesworth, 114 F.3d 601, 604 (6th Cir. 1997)
- In re Tyler, 110 F.3d 528, 529-30 (8th Cir. 1997)
- Est. of Rosenberg v. Crandell, 56 F.3d 35, 36-37 (8th Cir. 1995)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Bediako v. Stein Mart, Inc., 354 F.3d 835, 839 (8th Cir. 2004)
- Martin v. Sargent, 780 F.2d 1334, 1337 (8th Cir. 1985)
- Ellis v. City of Minneapolis, 518 F. App'x 502, 504 (8th Cir. 2013) (per curiam)
- Davis v. Hall, 992 F.2d 151, 152-53 (8th Cir. 1993) (per curiam)
- Johnson v. Outboard Marine Corp., 172 F.3d 531, 535 (8th Cir. 1999)
- Burke v. N.D. Department of Corrections & Rehabilitation, 294 F.3d 1043, 1044 (8th Cir. 2002) (per curiam)
- Sanders v. Sears, Roebuck & Co., 984 F.2d 972, 975-76 (8th Cir. 1993)
- Monell v. Department of Social Services, 436 U.S. 658, 690, 694 (1978)
- Crumpley-Patterson v. Trinity Lutheran Hospital, 388 F.3d 588, 591 (8th Cir. 2004)
- Brewington v. Keener, 902 F.3d 796, 801 (8th Cir. 2018)
- Clay v. Conlee, 815 F.2d 1164, 1170 (8th Cir. 1987)
- Estelle v. Gamble, 429 U.S. 97, 104-06 (1976)
- Jolly v. Knudsen, 205 F.3d 1094, 1096 (8th Cir. 2000)
- Dulany v. Carnahan, 132 F.3d 1234, 1239 (8th Cir. 1997)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)
- Barton v. Taber, 820 F.3d 958, 965 (8th Cir. 2016)
- Marsh v. Phelps County, 902 F.3d 745, 754 (8th Cir. 2018)
- Ashcroft v. Iqbal, 556 U.S. 662, 676 (2009)
- Parrish v. Ball, 594 F.3d 993, 1001 (8th Cir. 2010)
- Davis v. Buchanan County, 11 F.4th 604, 624 (8th Cir. 2021)
- Jackson v. Riebold, 815 F.3d 1114, 1119-20 (8th Cir. 2016)
- Hott v. Hennepin County, 260 F.3d 901, 905-06 (8th Cir. 2001)
- Doe v. Washington County, 150 F.3d 920, 923 (8th Cir. 1998)
- Kiefer v. Isanti County, 71 F.4th 1149, 1152-53 (8th Cir. 2023)
- Pembaur v. City of Cincinnati, 475 U.S. 469, 480-83 (1986) (plurality opinion)
- City of Rapid City v. Pennington County, 669 N.W.2d 120, 124 (S.D. 2003)
- Board of County Commissioners of Bryan County v. Brown, 520 U.S. 397, 404 (1997)
- Johnson v. Douglas County Medical Department, 725 F.3d 825, 828 (8th Cir. 2013)
- Ulrich v. Pope County, 715 F.3d 1054, 1061 (8th Cir. 2013)
- United States v. Batchelder, 442 U.S. 114, 124 (1979)
- Stevens v. Redwing, 146 F.3d 538, 546 (8th Cir. 1998)

- Phillips v. Rose, No. 4:23-CV-00825-JSD, 2023 WL 5748434, at *6 (E.D. Mo. Sept. 6, 2023)
- Smith v. Powers, No. C 98-1832 CAL(PR), 1998 WL 355818, at *1 (N.D. Cal. June 18, 1998)

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