

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Sanchez Martin v. Magistrate Judge Aric J. Rutkowski, et al.

Sanchez Martin · No. 3:25-CV-927-PPS-JEM · Decided December 23, 2025

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Sanchez Martin’s prisoner civil-rights action under 28 U.S.C. § 1915A for failure to state a claim. The court held that Martin’s allegations concerning an alleged relationship between a magistrate judge and prosecutor were too sparse and did not overcome applicable judicial and prosecutorial immunities or establish a viable claim under Heck v. Humphrey. The court also concluded that Martin’s later letter did not remedy the deficiencies in his complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	December 23, 2025
DOCKET	3:25-CV-927-PPS-JEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 dismissed at the screening stage under 28 U.S.C. § 1915A after plaintiff failed to file a proper amended complaint and failed to state a plausible claim.
STANDARD OF REVIEW	At § 1915A screening, the court determines whether the complaint states a plausible claim for relief; conclusory, sparse, or speculative allegations are insufficient.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Sanchez Martin v. Magistrate Judge Aric J. Rutkowski, Sarah B. Troyer, Director Machowiak, et al.

TOPICS

section 1983

prisoners rights

motions to dismiss

civil procedure

due process

PRACTICE AREAS

civil procedure

civil rights

prisoner litigation

constitutional law

QUESTIONS PRESENTED

1. Whether Martin's complaint and subsequent letter stated a plausible claim under 42 U.S.C. § 1983.
2. Whether the claims were barred by absolute judicial or prosecutorial immunity.
3. Whether any malicious-prosecution or conspiracy claim was barred by *Heck v. Humphrey* because Martin did not establish that his conviction had been reversed, expunged, or otherwise invalidated.
4. Whether the action should be dismissed under 28 U.S.C. § 1915A after Martin failed to file a proper amended complaint.

HOLDINGS

1. Martin failed to state any plausible claim because his allegations were too sparse, vague, and speculative to identify actionable conduct or establish the elements of his asserted constitutional claims.
2. The complaint could not proceed against defendants whose alleged conduct fell within absolute prosecutorial or judicial immunity.
3. Any claim that would necessarily imply the invalidity of Martin's conviction could not proceed unless the conviction had been reversed, expunged, or otherwise declared invalid.

KEY QUOTATIONS

“Simply put, even after being given an opportunity to do so, he has failed to state any plausible claims.” (at 3)

“Accordingly, this case is *DISMISSED* pursuant to 28 U.S.C. § 1915A for failure to state a claim upon which relief can be granted.” (at 3)

FACTUAL BACKGROUND

Martin, a prisoner proceeding without counsel, alleged that Magistrate Judge Aric J. Rutkowski and Prosecutor Sarah B. Troyer had an improper relationship while his criminal case was pending. He claimed that the relationship led to a conspiracy to remove him from society through a criminal conviction, violating his Sixth and Fourteenth Amendment rights. He supplied no details about the defendants' acts, the underlying criminal case, the effect on him, or whether his conviction had been invalidated.

PROCEDURAL HISTORY

The court previously screened Martin's complaint and granted him until December 18, 2025, to file an amended complaint, warning that failure to do so would result in dismissal under 28 U.S.C. § 1915A. Martin instead filed an unsigned letter attempting to explain his claims. The court considered the letter as a possible amendment but concluded that the allegations remained insufficient and dismissed the action for failure to state a claim.

DISPOSITION

dismissed

CASES CITED

- Swanson v. Citibank, N.A., 614 F.3d 400, 403 (7th Cir. 2010)
- Beaman v. Freesmeyer, 776 F.3d 500, 510-11 (7th Cir. 2015)
- Jones v. Cummings, 998 F.3d 782, 787-88 (7th Cir. 2021)
- Cannon v. Newport, 850 F.3d 303, 307 (7th Cir. 2017)
- Polzin v. Gage, 636 F.3d 834, 838 (7th Cir. 2011)
- Heck v. Humphrey, 512 U.S. 477, 484-87 (1994)
- Thompson v. Clark, 596 U.S. 36, 44 (2022)

OPINION

Martin

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF INDIANA

SOUTH BEND DIVISION

SANCHEZ MARTIN,

Plaintiff,

v. CAUSE NO. 3:25-CV-927-PPS-JEM

MAGISTRATE JUDGE ARIC J. RUTKOWSKI, et al.,

Defendants.

OPINION AND ORDER

Sanchez Martin, a prisoner without a lawyer, was granted until December 18, 2025, to file an amended complaint in response to my screening order. See generally ECF

4. He was cautioned that if he didn't do so by the deadline, his case would be dismissed without further notice pursuant to 28 U.S.C. § 1915A because his complaint failed to state any claims for which relief could be granted. *Id.* at 4. Instead of doing so, he filed a letter attempting to further explain his claims. ECF 7. Even if the letter could be construed as an amendment to his original complaint,¹ the case would still need to be dismissed. Martin's complaint alleges Magistrate Judge Aric J. Rutkowski and Prosecutor Sarah B. Troyer were "involved in an improper sexual affair from May of 2022 through 1 The letter is not signed in accordance with Federal Rule of Civil Procedure 11, nor is it procedurally proper under this court's local rules. See N.D. Ind. L.R. 15-1 (amended pleading should "reproduce the entire pleading as amended"); N.D. Ind. L.R. 7-6 ("court may require parties representing themselves to use clerk-supplied forms"). May of 2025." ECF 1 at 2. His criminal case was pending before the court during that time. He

claims Director Machowiak found out about the affair and investigated it. He states, “Due to the illicit activity a conspiracy was entered into and plans made, then executed, to remove my person from society by means of a criminal conviction, thus violating my Sixth and Fourteenth Amendment rights.” *Id.* He provides zero additional details about the actions of the defendants, the underlying case itself (including the case number and whether his conviction has been overturned), or why he believes his constitutional rights were violated. In my screening order, I explained that Martin’s complaint suffers from multiple deficiencies. To begin, his allegations are simply too sparse to state a plausible claim. See *Swanson v. Citibank, N.A.*, 614 F.3d 400, 403 (7th Cir. 2010) (“[A] plaintiff must do better than putting a few words on paper that, in the hands of an imaginative reader, might suggest that something has happened to her that might be redressed by the law.”) (emphasis in original)); see also *Beaman v. Freesmeyer*, 776 F.3d 500, 510–11 (7th Cir. 2015) (describing elements of conspiracy and noting that evidence of it “cannot be speculative”). Next, although Martin’s allegations are too vague to determine his precise claims, I note there are limits on the types of violations 42 U.S.C. § 1983 covers and on the people or entities that may be sued. See, e.g., *Jones v. Cummings*, 998 F.3d 782, 787–88 (7th Cir. 2021) (prosecutors are “absolutely immune” for activities associated with “core prosecutorial functions” even if they engaged in “unlawful rogue conduct”); *Cannon v. Newport*, 850 F.3d 303, 307 (7th Cir. 2017) (“defendants whom he sued are entitled to immunity, having acted either as lawyers for the state or in a judicial capacity”); *Polzin v. Gage*, 636 F.3d 834, 838 (7th Cir. 2011) (“A judge has absolute immunity for any judicial actions unless the judge acted in absence of all jurisdiction.”). Finally, even if Martin had some sort of plausible malicious prosecution or conspiracy type claim—a finding I do not reach—it would still be barred unless his conviction is no longer valid. See *Heck v. Humphrey*, 512 U.S. 477, 486–87 (1994) (plaintiff cannot obtain an award of damages for wrongful incarceration or pursue any other claim that would necessarily imply the invalidity of his conviction unless it is reversed on direct appeal, expunged, or otherwise declared invalid); see also *Thompson v. Clark*, 596 U.S. 36, 44 (2022) (federal claims for malicious prosecution brought pursuant to 42 U.S.C. § 1983 require that the prosecution was terminated in favor of the accused) (citing *Heck*, 512 U.S. at 484-85). Martin’s current letter does nothing to remedy these problems. He again insists that Magistrate Judge Aric J. Rutkowski and Prosecutor Sarah B. Troyer were involved in an “inappropriate relationship” which violated his constitutional rights. ECF 7. Specifically, he claims he had a right to an “impartial decision maker” but that the relationship “created a situation where there was a conflict of interest and the impartial decisionmaker became biased.” *Id.* He doesn’t explain what Judge Rutkowski or the other defendants did, why any alleged actions/decisions weren’t subject to immunity, how it affected Martin, or whether his current conviction has been reversed. Simply put, even after being given an opportunity to do so, Martin has failed to state any plausible claims. See *Swanson*, 614 F.3d at 403; *Beaman*, 776 F.3d at 510–11. Accordingly, this case is DISMISSED pursuant to 28 U.S.C. § 1915A for failure to state a claim upon which relief can be granted. SO ORDERED. ENTERED: December 23, 2025. /s/

Philip P. Simon

PHILIP P. SIMON, JUDGE

UNITED STATES DISTRICT COURT

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