

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PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown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)

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