

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN

Brandon A. Mentch v. K. Garceau, Sgt. Rocha, Sgt. Trimble, and
Unit Manager Blount

Mentch v. Garceau · No. 25-cv-832-wmc · Decided January 29, 2026

SUMMARY

The United States District Court for the Western District of Wisconsin screened Brandon Mentch’s pro se 42 U.S.C. § 1983 complaint concerning alleged inadequate medical care and prison conditions. The court dismissed the complaint and supplements without prejudice under Federal Rule of Civil Procedure 8 because they did not provide sufficient detail regarding the defendants’ actions, resulting harm, and relevant dates. The court denied a motion to submit an inmate letter and allowed Mentch until March 2, 2026, to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Western District of Wisconsin
WRITING FOR THE COURT	William M. Conley
JURISDICTION	United States District Court for the Western District of Wisconsin
DECIDED	January 29, 2026
DOCKET	25-cv-832-wmc
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a pro se prisoner’s complaint and supplements filed without prepayment of the full filing fee under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	At screening under 28 U.S.C. § 1915(e)(2), the court accepted the plaintiff’s allegations as true and construed his pro se complaint generously, while determining whether the pleadings were legally frivolous or malicious, failed to state a claim, or sought damages from an immune defendant.
PRECEDENTIAL VALUE	Unpublished district court opinion; persuasive authority only
PARTIES	Brandon A. Mentch v. K. Garceau, Sgt. Rocha, Sgt. Trimble, Unit Manager Blount

TOPICS

prisoners rights

cruel and unusual punishment

pleadings

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

pleading and amendment

QUESTIONS PRESENTED

1. Whether the complaint and supplements stated a cognizable Eighth Amendment claim under 42 U.S.C. § 1983.
2. Whether the complaint and supplements satisfied Federal Rule of Civil Procedure 8(a)(2)'s requirement of a short and plain statement showing entitlement to relief.
3. Whether the plaintiff should be given an opportunity to amend before dismissal of his pro se action.
4. Whether the plaintiff's motion to submit a letter from a fellow inmate should be granted at the screening stage.

HOLDINGS

1. The complaint and supplements failed to satisfy Rule 8 because they did not provide defendants with sufficient notice of what happened, what harm resulted, and, for some allegations, when the incidents occurred and who was involved.
2. As currently pleaded, the allegations did not state a cognizable Eighth Amendment claim because they lacked sufficient factual detail concerning the serious conditions or medical needs, defendants' deliberate indifference, and resulting harm.
3. The court gave Mentch a brief opportunity to amend rather than immediately dismissing the action with prejudice.
4. Any amended complaint could not join unrelated claims against different defendants; multiple defendants may be joined only when the claims arise from the same transaction or series of related transactions and involve common questions of law or fact.

KEY QUOTATIONS

“Prison conditions violate the Eighth Amendment only when they are so serious that they result in the denial of “the minimal civilized measure of life’s necessities,”” (at 2)

“plaintiff cannot bring unrelated claims against different defendants in the same case.” (at 3)

FACTUAL BACKGROUND

Mentch alleged that correctional staff at Columbia Correctional Institution failed to provide medication on three occasions, clean sheets on twelve occasions, razors he had purchased on eleven occasions, and cleaning supplies. He also referred without detail to a broken shower. He alleged that Unit Manager Blount and Warden K. Garceau were notified of these issues but did nothing to remedy them. The pleadings did not identify sufficient details concerning the medication, resulting harm, reasons for the denials, timing and responsible persons for the cleaning-supply and shower allegations, or the personal actions of each defendant.

PROCEDURAL HISTORY

Mentch filed a complaint under 42 U.S.C. § 1983 concerning alleged denial of medication, clean sheets, razors, cleaning supplies, and access to a working shower while incarcerated. He filed several supplements and moved to submit a letter from another inmate. The court screened the pleadings, dismissed the complaint and supplements without prejudice for failure to satisfy Federal Rule of Civil Procedure 8, denied the motion as premature, and granted Mentch until March 2, 2026, to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- Arnett v. Webster, 658 F.3d 742, 751 (7th Cir. 2011)
- Estelle v. Gamble, 429 U.S. 97, 103-04 (1976)
- Farmer v. Brennan, 511 U.S. 825, 832 (1994)
- Hudson v. Palmer, 468 U.S. 517, 526-27 (1984)
- Rhodes v. Chapman, 452 U.S. 337, 347 (1981)
- Lunsford v. Bennett, 17 F.3d 1574, 1579 (7th Cir. 1994)
- Felton v. City of Chi., 827 F.3d 632, 636 (7th Cir. 2016)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Wheeler v. Wexford Health Sources, Inc., 689 F.3d 680, 683 (7th Cir. 2012)