

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Steven Murphy v. Anthony Wills, Caly Smith, Brenden Garcia, and
C/O Tyner

Murphy v. Wills · No. 3:26-cv-00103-MAB · Decided April 29, 2026

SUMMARY

The court conducted preliminary screening under 28 U.S.C. § 1915A of Steven Murphy’s § 1983 complaint concerning alleged excessive force, denial of medical care, and retaliation at Menard Correctional Center. The court allowed the excessive-force, deliberate-indifference, and retaliation claims to proceed against Garcia, Tyner, and Smith, while dismissing Anthony Wills without prejudice for lack of personal involvement.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	United States Magistrate Judge Beatty
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	April 29, 2026
DOCKET	3:26-cv-00103-MAB
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 screened at the preliminary-review stage under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss any portion of a prisoner complaint that is frivolous, malicious, fails to state a claim, or seeks damages from an immune defendant. At screening, the complaint must allege enough facts to state a plausible claim for relief.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum and order; precedential status is unknown in the source metadata.

TOPICS

- section 1983
- prisoners rights
- police misconduct
- first amendment
- cruel and unusual punishment

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the allegations that Garcia and Tyner repeatedly sprayed Murphy with mace without provocation stated an Eighth Amendment excessive-force claim.
2. Whether the allegations that Garcia and Tyner denied Murphy medical treatment and a shower after the mace exposure stated an Eighth Amendment deliberate-indifference claim.
3. Whether the allegations that Smith, Garcia, and Tyner attacked Murphy in response to his grievances and lawsuits stated a First Amendment retaliation claim.
4. Whether Murphy stated a § 1983 claim against Wills based solely on Wills's retention of Garcia as a staff member.

HOLDINGS

1. The allegations that Garcia and Tyner sprayed Murphy with excessive amounts of mace without provocation and injured him were sufficient to state a colorable Eighth Amendment excessive-force claim at the preliminary-review stage.
2. The allegations that Garcia and Tyner denied Murphy medical treatment and a shower after spraying him with mace, causing blurred vision, were sufficient to state a deliberate-indifference claim.
3. Murphy sufficiently pleaded a First Amendment retaliation claim against Smith, Garcia, and Tyner based on allegations that they caused or carried out the mace attack in retaliation for his grievances and lawsuits.
4. Murphy failed to state a claim against Wills because the complaint alleged no personal involvement by Wills and sought to impose liability based only on Wills's supervisory position and retention of Garcia.

KEY QUOTATIONS

“Correctional officers violate the Eighth Amendment when they use force not in a good faith effort to maintain or restore discipline, but maliciously and sadistically for the very purpose of causing harm.”

(Discussion, Count 1)

“A complaint states a claim for retaliation when it sets forth ‘a chronology of events from which retaliation may plausibly be inferred.’” (Discussion, Count 3)

FACTUAL BACKGROUND

Murphy, an Illinois prisoner, alleged that on December 24, 2024, correctional officers Garcia and Tyner repeatedly sprayed him with mace after ordering him to dress and come with them, causing choking and blurred vision. He alleged that the officers then denied him medical treatment and access to a shower. Murphy further alleged that Smith instigated the attack in retaliation for his grievances and that Garcia and Tyner carried it out because of his grievance and prior lawsuits. He alleged that former warden Wills was liable merely for retaining Garcia on staff after prior misconduct.

PROCEDURAL HISTORY

Steven Murphy filed a pro se § 1983 complaint alleging excessive force, denial of medical care, and retaliation. The court conducted preliminary review under § 1915A, allowed Counts 1 and 2 to proceed against Brenden Garcia and C/O Tyner and Count 3 to proceed against Caly Smith, Garcia, and Tyner, and dismissed Anthony Wills without prejudice for failure to state a claim based on lack of personal involvement.

DISPOSITION

other

CASES CITED

- Taylor v. Ways, 999 F.3d 478, 493 (7th Cir. 2021)
- Horshaw v. Casper, 910 F.3d 1027, 1029-30 (7th Cir. 2018)
- Wilborn v. Ealey, 881 F.3d 998, 1006 (7th Cir. 2018)
- Wilkins v. Gaddy, 559 U.S. 34, 40 (2010)
- Rasho v. Elyea, 856 F.3d 469, 475 (7th Cir. 2017)
- Farmer v. Brennan, 511 U.S. 825, 842 (1994)
- Cooper v. Casey, 97 F.3d 914, 917 (7th Cir. 1996)
- Gomez v. Randle, 680 F.3d 859, 866 (7th Cir. 2012)
- Walker v. Thompson, 288 F.3d 1005 (7th Cir. 2002)
- Zimmerman v. Tribble, 226 F.3d 568, 573 (7th Cir. 2000)
- McKinley v. Schoenbeck, 731 F. App'x 511, 515 (7th Cir. 2018)
- Surita v. Hyde, 665 F.3d 860, 878-79 (7th Cir. 2011)
- Bridges v. Gilbert, 557 F.3d 541, 551 (7th Cir. 2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)