

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

Willard Will Bee Lawson v. Drew Hahn, J. Holt, and William Heeg

Lawson · No. 3:24-CV-852-JTM-AZ · Decided February 2, 2026

SUMMARY

The court screens Willard Will Bee Lawson’s amended prisoner complaint concerning a gnat or fruit fly infestation and overcrowding at the LaPorte County Jail. It permits Lawson to proceed against Lieutenant Drew Hahn in his individual capacity on a Fourteenth Amendment conditions-of-confinement claim, while dismissing the remaining claims and defendants J. Holt and William Heeg. The court directs service of process on Hahn and orders him to respond to the permitted claim.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	James T. Moody
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	February 2, 2026
DOCKET	3:24-CV-852-JTM-AZ
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se pretrial detainee's amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must review a prisoner's complaint and dismiss it if it is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Willard Will Bee Lawson v. Drew Hahn, J. Holt, William Heeg

TOPICS

- prisoners rights
- due process
- section 1983
- civil procedure
- service of process

PRACTICE AREAS

prisoner civil rights

constitutional conditions of confinement

federal civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint stated a Fourteenth Amendment conditions-of-confinement claim based on the alleged gnat or fruit fly infestation.
2. Whether Lawson adequately alleged personal involvement by Lieutenant Drew Hahn, Sheriff William Heeg, and Lieutenant J. Holt.
3. Whether the alleged overcrowding stated a constitutional claim when Lawson did not allege how it personally affected him.

HOLDINGS

1. A pest infestation may constitute a constitutional violation when it presents a substantial risk of serious harm, including sanitation concerns or physical harm, and the detainee alleges that an individual defendant failed to take objectively reasonable measures to abate that risk.
2. Lawson adequately stated a claim against Lieutenant Drew Hahn because the alleged responsibility for jail maintenance and daily operations supported an inference that Hahn was personally involved in, and had authority to address, the infestation.
3. The amended complaint failed to state a claim against Sheriff William Heeg and Lieutenant J. Holt because it alleged no personal involvement beyond their supervisory positions.
4. The overcrowding allegations failed to state a claim because Lawson did not allege that the condition personally deprived him of a constitutional right.

KEY QUOTATIONS

“A document filed pro se is to be liberally construed, and a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.” (Opinion text)

“A pretrial detainee states a valid Fourteenth Amendment claim against an individual defendant by alleging that the defendant “did not take reasonable available measures to abate the risk of serious harm to [plaintiff], even though reasonable officers under the circumstances would have understood the high degree of risk involved, making the consequences of the defendants’ conduct obvious.”” (Opinion text)

FACTUAL BACKGROUND

Lawson alleged that while detained at the LaPorte County Jail he was exposed to a persistent gnat or fruit fly infestation throughout the cell blocks, kitchen, showers, and toilets. He alleged that the insects entered food, drinks, bedding, and clothing, and that jail cleaning efforts did little to remedy the infestation. He also alleged overcrowding, including an extra inmate sleeping on the floor near a toilet, but did not explain how that condition personally affected him.

PROCEDURAL HISTORY

The court previously screened Lawson's original complaint and determined that it failed to state a claim. Lawson filed an amended complaint alleging unconstitutional jail conditions, including a gnat or fruit fly infestation and overcrowding. On screening the amended complaint, the court granted leave to proceed against Lieutenant Drew Hahn on a Fourteenth Amendment conditions-of-confinement claim, dismissed all other claims, dismissed Holt and Heeg, and directed service on Hahn.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Mulvania v. Sheriff of Rock Island County, 850 F.3d 849, 856 (7th Cir. 2017)
- Bell v. Wolfish, 441 U.S. 520, 535, 541 (1979)
- Hardeman v. Curran, 933 F.3d 816, 820 (7th Cir. 2019)
- Rhodes v. Chapman, 452 U.S. 337, 347 (1981)
- Gray v. Hardy, 826 F.3d 1000, 1005 (7th Cir. 2016)
- Thomas v. Dart, 39 F.4th 835, 841 (7th Cir. 2022)
- Smith v. Dart, 803 F.3d 304, 312 (7th Cir. 2015)
- Mitchell v. Kallas, 895 F.3d 492, 498 (7th Cir. 2018)
- Pittman v. Madison County, 108 F.4th 561, 572 (7th Cir. 2024)
- Mays v. Emanuele, 853 F. App'x 25, 27 (7th Cir. 2021)
- Kingsley v. Hendrickson, 576 U.S. 389, 398 (2015)
- Mays v. Dart, 974 F.3d 810, 819 (7th Cir. 2020)
- Miranda v. County of Lake, 900 F.3d 335, 353 (7th Cir. 2018)
- Moderson v. City of Neenah, 137 F.4th 611, 617 (7th Cir. 2025)
- Aguilar v. Gaston-Camara, 861 F.3d 626, 633 (7th Cir. 2017)
- Burks v. Raemisch, 555 F.3d 592, 594 (7th Cir. 2009)

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