

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PRECEDENTIAL VALUE	unpublished district court opinion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)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION WILLARD WILL BEE LAWSON, Plaintiff, v. CAUSE NO. 3:24-CV-852-JTM-AZ DREW HAHN, J. HOLT, WILLIAM HEEG, Defendants. OPINION and ORDER Willard Will Bee Lawson, a prisoner without a lawyer, filed an amended complaint about the conditions of confinement he faced for five months at the LaPorte County Jail (DE # 19), after the court screened his original complaint and determined it did not state a claim.

(DE # 18.) “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.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (quotation marks and citations omitted). Nevertheless, under 28 U.S.C. § 1915A, the court must review the merits of a prisoner complaint and dismiss it if the action is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief against a defendant who is immune from such relief.

Lawson alleges that while he was detained at the LaPorte County Jail from May through December 2024, he was forced to live with a gnat or fruit fly infestation. He says swarms of gnats were present in every cell block, the kitchen, the showers, and the toilets.

Although trustees would clean the showers once a week, the cleaning had little to no effect on the gnats, and no other steps, like spraying, were taken to control the gnats. He alleges the swarms in the shower area were made up of 50-100 gnats within a 5-foot radius, and the cells had approximately 10-25 gnats in them at all times. He complains the gnats would get into the food trays, drinks, bedding, and clothing.

He believes the gnat infestation was out of control and posed serious health risks. The court assumed in the previous screening order that the alleged gnat infestation presented a substantial risk of harm to Lawson and therefore rose to the level of a constitutional violation under the Fourteenth Amendment. (DE # 18 at 2-3.)

Under the Fourteenth Amendment, a pretrial detainee is protected from being held in “conditions that ‘amount to punishment.’” *Mulvania v. Sheriff of Rock Island Cnty.*, 850 F.3d 849, 856 (7th Cir. 2017) (quoting *Bell v. Wolfish*, 441 U.S. 520, 535 (1979)). Conditions may amount to punishment if, as a result, inmates are denied “the minimal civilized measure of life’s necessities,” which include “reasonably adequate ventilation, sanitation, bedding, hygienic materials, and utilities.” *Hardeman v. Curran*, 933 F.3d 816, 820 (7th Cir.

2019) (quoting *Rhodes v. Chapman*, 452 U.S. 337, 347 (1981) and *Gray v. Hardy*, 826 F.3d 1000, 1005 (7th Cir. 2016)). Pretrial detainees must also be reasonably protected from a substantial risk of serious harm. *Thomas v. Dart*, 39 F.4th 835, 841 (7th Cir. 2022). Pest infestations, like the one alleged here, can become a constitutional violation if they present a substantial risk of harm to the inmate, by, for example, raising sanitation concerns or physically harming the inmate.

See, e.g., *Smith v. Dart*, 803 F.3d 304, 312 (7th Cir. 2015). However, the claim could not proceed because Lawson had not identified a defendant who had the personal responsibility necessary to be held liable. For a defendant to be held liable, he must have some personal involvement in the alleged constitutional violation. See *Mitchell v. Kallas*, 895 F.3d 492, 498 (7th Cir.

2018). 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." *Pittman v. Madison Cnty.*

108 F.4th 561, 572 (7th Cir. 2024) (emphasis omitted). "A jail official's response to serious conditions of confinement is objectively unreasonable when it is 'not rationally related to a legitimate nonpunitive governmental purpose' or is 'excessive in relation to that purpose.'" *Mays v. Emanuele*, 853 F. App'x 25, 27 (7th Cir. 2021) (quoting *Kingsley v. Hendrickson*, 576 U.S. 389, 398 (2015)).

In determining whether a challenged condition is reasonable or whether it amounts to punishment, the court must consider the "totality of facts and circumstances." *Mays v. Dart*, 974 F.3d 810, 819 (7th Cir. 2020). Of note, "negligent conduct does not offend the Due Process Clause," and thus allegations of negligence, even gross negligence, do not state a Fourteenth Amendment claim.

Miranda v. Cnty. of Lake, 900 F.3d 335, 353 (7th Cir. 2018). In the amended complaint, Lawson clarifies that Lieutenant Drew Hahn is tasked with maintaining the jail and keeping up with the daily workings of the jail.

The court can reasonably infer that Lieutenant Hahn would have the necessary involvement in the daily upkeep that he would be aware of the gnat infestation and have the authority to take action to remedy it. Lawson may proceed against him.

However, Lawson does not describe the duties of Sheriff William Heeg or Lieutenant J. Holt in the amended complaint. The only basis alleged in the complaint to hold them responsible is their supervisory positions at the jail, which is not enough. See *Moderson v. City of Neenah*, 137 F.4th 611, 617 (7th Cir. 2025) ("A defendant cannot be held liable for a constitutional violation if she did not cause or participate in the alleged violation.") (citation omitted)); *Aguilar v. Gaston-Camara*, 861 F.3d 626, 633 (7th Cir.

2017) ("[T]he division of labor is critical to the efficient functioning of the [prison] organization."); *Burks v. Raemisch*, 555 F.3d 592, 594 (7th Cir. 2009) (no general respondeat superior liability under 42 U.S.C. § 1983). Lawson also raises claims concerning overcrowding at the LaPorte County Jail. He says that each cell had an extra inmate who had to sleep on the floor near the toilet, which put that inmate at risk of being urinated on every time an inmate uses the toilet.

In the previous screening order, the court noted that overcrowding, on its own, does not state a constitutional claim. See *Bell v. Wolfish*, 441 U.S. 520, 541 (1979) ("While confining a given number of people in a given amount of space in such a manner as to cause them to endure genuine privations and hardship over an extended period of time might raise serious questions under the Due Process Clause as to whether those conditions amounted to punishment, nothing even approaching such hardship is shown by this record.").

Instead, the court had to look to how Lawson was personally affected by the overcrowded conditions and evaluate whether he, personally, was deprived of a constitutional right as a result. (DE # 19 at 4-5.) In the amended complaint, Lawson does not explain how having a person on the floor in his cell affected him, personally. This does not state a claim for relief.

For these reasons, the court: (1)GRANTS Willard Will Bee Lawson leave to proceed against Lieutenant Drew Hahn in his individual capacity for compensatory and punitive damages for failing to take reasonable measures to address the gnat or fruit fly infestation at the LaPorte County Jail from March 2024 through December 2024 in violation of the Fourteenth Amendment; (2)DISMISSES all other claims; (3)DISMISSES J. Holt, William Heeg; (4)DIRECTS the clerk, under 28 U.S.C. § 1915(d), to request Waiver of Service from (and if necessary, the United States Marshals Service to use any lawful means to locate and serve process on) Lieutenant Drew Hahn at the LaPorte County Jail, with a copy of this order and the complaint (DE # 19); (5)ORDERS the LaPorte County Sheriff to provide the full name, date of birth, and last known home address of any defendant who does not waive service if it has such information; and (6)ORDERS, under 42 U.S.C. § 1997e(g)(2), Lieutenant Drew Hahn to respond, as provided for in the Federal Rules of Civil Procedure and N.D.

Ind. L.R. 10-1(b), only to the claims for which the plaintiff has been granted leave to proceed in this screening order. SO ORDERED. Date: February 2, 2026 s/James T. Moody. JUDGE JAMES T. MOODY UNITED STATES DISTRICT COURT