

NONPRECEDENTIAL DISPOSITION
To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Argued March 3, 2026
Decided March 11, 2026

Before

DORIS L. PRYOR, *Circuit Judge*

JOSHUA P. KOLAR, *Circuit Judge*

NANCY L. MALDONADO, *Circuit Judge*

Nos. 25-2414 & 25-2415

CARNELL D. TAYLOR,
Plaintiff-Appellant,

v.

JOHN IDLEBURG, et al.,
Defendants-Appellees.

Appeals from the United States District
Court for the Northern District of
Illinois, Eastern Division.

No. 25 C 4380

Jorge L. Alonso,
Judge.

ORDER

Carnell Taylor, an Illinois detainee, sued several officials¹ at the Lake County Jail for failing to protect him from an attack by another detainee. Taylor alleged that jail officials housed him in the same wing as his attacker, despite an alleged “keep separate” order in place for the two of them. The district court dismissed the complaint

¹ The defendants were not served with process in the district court and are not participating in this appeal.

with prejudice at screening, concluding that Taylor pleaded himself out of court when he attached prison reports stating that the defendants lacked notice of any danger. But the district court should not have relied on documents that did not incontrovertibly contradict the complaint, so we vacate the judgment and remand the case for further proceedings.

Background

Last April, Taylor filed a pro se complaint under 42 U.S.C. § 1983, alleging that several officials at the Lake County Jail failed to protect him from a dangerous detainee. Because Taylor was a pretrial detainee, his claim arises under the Fourteenth Amendment's Due Process Clause, not the Eighth Amendment's bar on cruel and unusual punishment. *Kemp v. Fulton County*, 27 F.4th 491, 495 (7th Cir. 2022).

Taylor alleged that he was attacked the day after he was booked into the jail. While descending the stairs in his jail wing, he was ambushed by another detainee, Richard McMath, who bludgeoned him with an electronic smart tablet packed inside a laundry bag.² Taylor suffered a laceration around his left eye; a concussion, resulting in post-concussive migraines, blurred vision, and balance issues; and post-traumatic stress disorder.

Taylor asserted that he and McMath never should have been housed together. Taylor alleged that he had “not a clue” that McMath was in the jail. He also alleged that the jail had a record ordering that McMath be kept separate from him.

Taylor attached to his complaint a grievance that he filed with the jail, along with two responses he received from jail staff. In the grievance, Taylor complained that jail staff allowed McMath to be housed with him, despite the keep-separate order. Sergeant Timothy Specht—a named defendant in this suit—denied the grievance by saying, “You were interviewed by Classification and were asked specifically if you had any enemies in custody, and you stated no. ... You were not knowingly placed in the pod with an enemy.” Taylor appealed the response, and Lieutenant Timothy Reidy—another named defendant—agreed with Specht's conclusion.

² All Lake County detainees, unless restricted, are given a smart tablet.

The district court, relying on these attachments, screened and dismissed Taylor's federal claims with prejudice.³ See 28 U.S.C. § 1915A. The court concluded that Taylor's claims failed because he did not identify McMath as a threat during his classification interview. In the court's view, Taylor's attachments foreclosed the possibility of an amendment that would change the outcome.

Taylor filed two notices of appeal. At his request, we consolidated the appeals.

Analysis

We review dismissals under § 1915A de novo, using the standard that applies to ordinary Rule 12(b)(6) dismissals. *Cesal v. Moats*, 851 F.3d 714, 720 (7th Cir. 2017). We will therefore take the facts alleged in Taylor's pleadings in the light most favorable to him, affirming "only if it is beyond doubt that [Taylor] cannot prove facts sufficient to support [his] position." *Citizens Ins. Co. of Am. v. Wynndalco Enters., LLC*, 70 F.4th 987, 994 (7th Cir. 2023).

Taylor, now represented by counsel, first challenges the district court's conclusion that he pleaded himself out of court based on statements contained in his attachments to the complaint. The court reasoned that a keep-separate order could not defeat the statements in the attachments:

It seems that Plaintiff believes that a "keep separate" order from a prior period of incarceration should have put the officers on notice that he should not be housed near McMath. But a prior order would not necessarily have put jail personnel on notice of a present danger given Plaintiff's representation in February 2024 that he had no known enemies at the jail.

In Taylor's view, the court wrongly credited the defendants' statements—as set forth in their two responses to his grievance, attached to his complaint—and ignored his own allegation that the defendants had a record of his keep-separate order but deliberately disregarded it.

Taylor is correct that the district court should not have accepted the defendants' statements as true. Although the court was free to consider the contents of the

³ The court also dismissed any state-law claims without prejudice so that Taylor could pursue them in state court.

attachments to Taylor's complaint, *see Citizens Ins. Co. of Am.*, 70 F.4th at 995 (citing Fed. R. Civ. P. 10(c)); *Tierney v. Vahle*, 304 F.3d 734, 738 (7th Cir. 2002), it should not have automatically credited the statements as if they were alleged by Taylor himself, *Otis v. Demarasse*, 886 F.3d 639, 646–47 (7th Cir. 2018) (holding that district court erred by crediting content of attached police report over allegations in complaint). This is especially true when, as here, a plaintiff attaches documents authored by defendants. *Id.* Courts should not accept as true every word in a document prepared by defendants and attached to a complaint by a plaintiff; what matters is “why a plaintiff attached the documents, who authored the documents, and the reliability of the documents.” *Id.* at 647 (quoting *N. Ind. Gun & Outdoor Shows, Inc. v. City of South Bend*, 163 F.3d 449, 455 (7th Cir. 1998)). The district court here considered none of those factors.

Most importantly, it is not apparent that the attached grievance responses here refuted Taylor's allegation that the jail had a record of a keep-separate order between him and McMath. True, “[w]hen an exhibit incontrovertibly contradicts the allegations in the complaint, the exhibit ordinarily controls, even when considering a motion to dismiss.” *Bogie v. Rosenberg*, 705 F.3d 603, 609 (7th Cir. 2013). But the defendants' statements asserted only that a classification officer “asked specifically if [Taylor] had any enemies in custody, and [he] stated no.” And whether Taylor knew that he had enemies in custody does not bear on his allegation of a keep-separate order.

Further, we remind the district court that plaintiffs need not plead facts corresponding to each element of a legal theory. As we have reiterated, plaintiffs are not required to “allege legal theories or even facts corresponding to each element of a claim,” especially when they are proceeding without an attorney. *Sargeant v. Barfield*, 87 F.4th 358, 361 (7th Cir. 2023); *see also Chapman v. Yellow Cab Coop.*, 875 F.3d 846, 848 (7th Cir. 2017). To state a failure-to-protect claim, Taylor needed to allege only that officers placed him with someone known to be violent and that he was attacked by that person. *See Sargeant*, 87 F.4th at 362. He satisfied that test.

For the foregoing reasons, we VACATE the district court's judgment and REMAND the case for further proceedings.