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## ***LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH***

**By Don Hays**

Month of June – 2026 - ALTERNATIVE

## LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

### Month of June - 2026 - ALTERNATIVE

#### Raddant v. Douglas County, et al., 170 F. 4th 583, March 12, 2026.

**THE CASE:** Raddant was arrested for a minor offense and brought to the police station for processing. Raddant did not cooperate. Officers used force to aid in processing Raddant. During this process, Raddant, while handcuffed, slipped and fell, thereby suffering significant injuries. Raddant sued the Officers. The District Court declared that no jury could find that the Officers used excessive force when processing Raddant and, therefore, granted the Officer's motion for summary judgment. Did the District Court err in dismissing the case Raddant brought against the Officers?

**FACTS:** In the dark of night, the Arresting Officer noticed a parked vehicle with its windows open and expired registration. He did not see anyone exit the car but soon noticed Raddant wandering nearby. Their extended encounter and conversation ended with the Officer arresting Raddant for a minor violation. The Officer's body-worn camera recorded all of his interactions with Raddant from their first encounter all the way through Raddant's processing at the local police station. For the bulk of the almost forty-five minutes that the camera recorded, Raddant went back and forth arguing with the Arresting Officer and then with other officers at the police station. By the time Raddant arrived at the station, he was very agitated. The Arresting Officer removed Raddant from the police vehicle and eventually escorted him into the main booking area of the station. In addition to the Arresting Officer's body camera, two other cameras in the booking area recorded the events—one from behind Raddant, and one from the front, although a counter in the booking area obstructed the front view of Raddant from the waist down. Once at the booking counter, Officer Two began performing a pat-down search while Officer Three assisted. Throughout the process, Raddant was agitated, complaining that he had an active MRSA infection on his wrist and that the Arresting Officer had removed his bandage.

[During this time, Raddant yelled, swore, and refused to stop talking and arguing as instructed. The Court of Appeals noted that these verbal behaviors did not justify any use of force and thus were not helpful to a court's analysis of the propriety of such force. The Court concluded, however, that there was no doubt that the videos supported a conclusion that Raddant appeared to be an obnoxious, loudmouthed, irritating arrestee who refused to stop arguing when instructed. Further, the Court noted that Fourth Amendment law, however, assumes that police officers have thick skin, and does not tolerate force used out of frustration or impatience. Unlike loud mouthiness and obnoxiousness, on the other hand, physical resistance and threats to officer safety can justify the use of force, as do threats of future physical actions. And so, for example, when an officer at the booking desk asked the Officers whether she should call for assistance, and Raddant responded "Yea, you better," the officers were entitled to take his threat of future resistance seriously and take action accordingly. Likewise, the officers' assessment of the use of force may also have been altered by Raddant's statement that if the officers continued to twist his arm "we're going to have issues." Therefore, the Court concluded that it would focus only on Raddant's acts of physical resistance or threats of such acts, as opposed to his refusal to follow commands like "stop talking," or "be quiet," and other verbal annoyances.]

Officers spent about eight minutes with Raddant at the booking desk while they attempted to search him for weapons and other contraband, during which time Raddant continued to argue with and exasperate the officers. Both parties agreed, and the video confirmed, that one Officer told Raddant, "you better stop or you are going to go to the floor, and you are not going to go down gently either." Under Raddant's version of events, he spent much of the time at the booking counter asking for medical help and to have the handcuffs loosened because they were hurting his wrists. The video confirmed that he did make these requests. Under the defendants' version of events, Raddant was tensing his body and resisting the officers' attempts to search him. Tensing bodies are more difficult to discern in the video, but there is definite evidence that the officers were having difficulty completing their search. Eventually, the video confirmed that a total of five Officers worked in the effort to assist with this uncooperative arrestee. The Officers decided that they would move him to a receiving cell to complete the search. Once in the cell, the Officers proceeded to walk Raddant toward a bed-shaped concrete slab in the receiving cell. A mattress was placed on the slab, and the Officer attempted to have Raddant sit on the mattress. However, the mattress slipped and Raddant fell face forward. He was severely injured as a consequence of this fall.

Raddant thereafter filed a civil rights action and argued that the Officers violated his Fourteenth Amendment rights by using excessive force and injuring him in the process. The district court organized Raddant's claims into three groups: "(1) force used in the booking area (handcuffs and arm twisting), (2) force used when moving Raddant from the booking area to the receiving cell ('dragging' him by the wrists), and (3) force used in the receiving cell (lifting up Raddant's leg and removing

the mattress pad).” The court allowed the following issues to go to the jury: whether the Officers should have loosened or adjusted the handcuffs while Raddant was in the booking area, and whether an Officer twisted Raddant's arm while another Officer refused to intervene. The district court judge granted summary judgment in favor of the Officers on all other matters. The jury found in favor of the Officers on the fact issues that went to trial, and Raddant did not appeal that jury verdict.

**ARGUMENT ON APPEAL:** Raddant argued that the district court erred by granting the Officers summary judgment on his claim that the officers used excessive force at the booking station and in the receiving cell.

**THE LAW:** To succeed on a claim of excessive force under the Fourteenth Amendment, a pretrial detainee must demonstrate “that the force purposely or knowingly used against him was objectively unreasonable” based on the particular facts and circumstances of the events. In doing so, a court must “also account for the ‘legitimate interests that stem from [the government's] need to manage the facility in which the individual is detained,’ appropriately deferring to ‘policies and practices that in th[e] judgment’ of jail officials ‘are needed to preserve internal order and discipline and to maintain institutional security.’ ” In the pretrial detainee context, Appellate Courts have suggested that district courts look at, among other things, “the relationship between the need for the use of force and the amount of force used; the extent of the plaintiff's injury; any effort made by the officer to temper or to limit the amount of force; the severity of the security problem at issue; the threat reasonably perceived by the officer; and whether the plaintiff was actively resisting.” While weighing these factors, a court must make allowances for the fact that officers must often make split-second decisions in chaotic and rapidly evolving circumstances, and do not have the benefit of hindsight that a court has upon later review.

**ISSUE #1:** Did the Officers use excessive force when they pulled Raddant away from the booking station and started walking him toward the holding cell? Therefore, did the District Court err in granting summary judgment in favor of the Officers on this issue?

**FINDINGS:** The Court found that the video showed that the force used by the Officers in pulling Raddant from the booking station was not excessive. Specifically, the Court concluded that it determined from watching all three relevant videos in slow motion that no reasonable juror could conclude that the officers used excessive force while turning Raddant around from the booking desk before walking him down the hall. Raddant was not cooperating with the officers and the officers needed to move him to a cell to complete their search. The three videos from three different angles show the three seconds in which the officers are turning Raddant around and removing him from the booking area. From those videos, the Court saw that one Officer was holding Raddant by the upper arm and a second Officer was holding Raddant by the forearm. Neither officer grabbed Raddant by the wrist or handcuffs. Just as one Officer yelled “Go,” the second Officer put his hand on Raddant's shoulder and started to pull him back and turning him around. According to the Court, it was clear that most of the force of the turn came from the Officer's grasp on Raddant's shoulder. In fact, one Officer let go of Raddant's arm almost immediately. The Court saw only very minor force used to turn Raddant around. Therefore, the Court concluded that since no jury could have found that the force used by the Officers was excessive, the District Court correctly granted the Officers summary judgment on this issue.

**ISSUE #2:** Did the Officers use excessive force when they placed Raddant in the holding cell? Specifically, could the Officers be held liable for the injuries Raddant suffered when he fell while being placed on the concrete slab in his holding cell. Therefore, did the District Court err in granting summary judgment in favor of the Officers on this issue?

**FINDINGS:** According to the Court, the videos clearly showed that Raddant resisted the Officer's efforts to place him in the holding cell, or that the officers reasonably believed he had resisted, their attempts to move him. Further, the videos clearly showed that the Officer's use of force was not large, and that the ultimate cause of Raddant's fall was his slip on a mattress in holding cell and not force being applied by the Officers in their attempt to deal with an obnoxious detainee.

Specifically, the Court declared that the videos do not leave any viable material issues for a jury to consider. What it saw on the videos was not the use of excessive force, but an unfortunate accident at best, or clumsiness, at worst. Could all of this have been avoided by lowering Raddant's agitation rather than ramping it up by engaging with his cacophonous complaints? Possibly. But the Court noted that excessive force cases are not opportunities for courts to opine on judges' interpretations of what police officers might have done better or differently. Its only role was to assess whether the force purposely or knowingly used against Raddant was objectively unreasonable from the standpoint of a reasonable officer's best assessment of the situation at hand. Therefore, the Court concluded that since no jury could have found that the force used by the Officers in the holding cell was excessive, the District Court correctly granted the Officers summary judgment on this issue.

**CONCLUSION:** The Court of Appeals affirmed District Court's judgment in granting summary judgment to the Officers.

**QUIZ QUESTIONS FOR THE MONTH OF JUNE – 2026 - ALTERNATIVE**

**Raddant v. Douglas County, et al., 170 F. 4th 583, March 12, 2026.**

1. The Fourteenth Amendment protects a pre-trial detainee from the use of excessive force by law enforcement authorities.
  - a. True.
  - b. False.
  
2. In this case, Raddant was an obnoxious detainee who frustrated and annoyed the Officers that were attempting to process him. Raddant suffered injuries during his processing. Does Illinois now prohibit an officer from using force against a person for purposes of punishment or retaliation?
  - a. Yes.
  - b. No.
  
3. In this case, Raddant complained that the Officers used excessive force when they pulled him away for the booking station and marched him toward a holding cell. Did the Courts agree with this argument?
  - a. Yes.
  - b. No.
  
4. In this case, Raddant complained that the Officers used excessive force when they placed him in his holding cell. The Courts rejected this argument.
  - a. True.
  - b. False.

**QUIZ ANSWERS FOR THE MONTH OF JUNE – 2026 - ALTERNATIVE**

**Raddant v. Douglas County, et al., 170 F. 4th 583, March 12, 2026.**

1. The Fourteenth Amendment protects a pre-trial detainee from the use of excessive force by law enforcement authorities.  
  
**a. True.** Pre-trial detainees are protected by the due process requirements of the Fourteenth Amendment.
  
2. In this case, Raddant was an obnoxious detainee who frustrated and annoyed the Officers that were attempting to process him. Raddant suffered injuries during his processing. Does Illinois now prohibit an officer from using force against a person for purposes of punishment or retaliation?  
  
**a. Yes.** Pursuant to the recently enacted SAFE-T Act, a peace officer shall not use force for purposes of punishment or retaliation. 720 ILCS 5/7-5.5 (e) (i)
  
3. In this case, Raddant complained that the Officers used excessive force when they pulled him away for the booking station and marched him toward a holding cell. Did the Courts agree with this argument?  
  
**b. No.** The Courts concluded that the Officers did not use excessive force when they took Raddant away from the booking station and toward a holding cell.
  
4. In this case, Raddant complained that the Officers used excessive force when they placed him in his holding cell. The Courts rejected this argument.  
  
**a. True.** The Courts declared that an accident caused Raddant to suffer injuries in his hold cell and that no reasonable jury could have concluded that the Officers' use of force caused Raddant's injuries.