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LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

By Don Hays

Month of August – 2026

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Ryan Steinhoff v. Matthew Malovrh et al., 170 F.4th 647, March 24, 2026

THE CASE USE OF FORCE AND QUALIFIED IMMUNITY: During the execution of a search warrant, Steinhoff was tackled by an officer and received a blow to his head. Was the Officer who tackled Steinhoff and the Officer who struck Steinhoff with a rifle entitled to qualified immunity from liability as a consequence of their conduct?

FACTS: A County Sheriff's Department investigated a methamphetamine trafficking operation involving Ryan Steinhoff. A Sheriff's Detective (Detective) applied for a warrant to search a property where he believed Steinhoff and others involved in the operation were living. The warrant application explained that law enforcement had arranged a controlled purchase of methamphetamine from Steinhoff earlier that month, that Steinhoff had a history of violent crime, and that his mental health was under evaluation in a pending misdemeanor case. A judge approved the application and authorized a search for evidence of methamphetamine possession. The property in question contained a two-story main residence and multiple small outbuildings. Due to the property's size and the number of individuals believed to be present, law enforcement assembled a SWAT team of officers to conduct the search.

The SWAT team executed the warrant and discovered Steinhoff in a camper on the property. The Detective and three other officers approached the camper, confronted Steinhoff, and ordered him to exit the camper and show his hands. Steinhoff exited the camper when an officer directed him to "get out," and "turn around." Once down the camper stairs, Steinhoff began to turn around and raise his hands. He then stopped with his back to the officers, partially facing an open field. Steinhoff claimed he stopped and stood still with his hands up, while the Detective and an Investigator contend that he began walking away toward the field, as if to flee. Suddenly, the Detective tackled Steinhoff from behind about three seconds after he exited the camper. An Investigator helped restrain him on the ground, including placing his knee on Steinhoff while the Detective handcuffed him.

At some point during the encounter, a rifle barrel struck Steinhoff's ear, causing a cut that required at least nine stitches. Steinhoff maintained that he saw the rifle barrel swing toward the side of his head and hit him while he was still standing. Further, after the takedown, Steinhoff complained about what happened, saying, "my ear's split with that gun you hit me with." An Officer responded, "[w]ell, don't take off—try to take off when we're giving you orders." Based on these events, Steinhoff argued that the Investigator intentionally struck him in the head with his rifle just as the takedown began. The Investigator denied any involvement in the initial tackle and argued that if his rifle hit Steinhoff at all, it was by accident while assisting the Detective after Steinhoff fell.

Steinhoff sued the Detective and the Investigator for using excessive force in violation of the Fourth Amendment during the takedown, when the rifle struck him, and when the Investigator placed his knee on Steinhoff's neck, head, or upper back while he was handcuffed. The officers moved for summary judgment and claimed qualified immunity. The district court denied the Investigator summary judgment on the limited aspect of the claim that he used excessive force when he knelt on Steinhoff. That claim went to trial where a jury found for the Investigator.

Moving to the Detective, the district court observed that, even assuming Steinhoff did not try to flee, a jury would "almost certainly" find that "an objective officer's use of force in taking Steinhoff to the ground and subdu[ing] him was not unreasonable" given the "murky dynamics" of an early morning drug raid. The district court further concluded that the Detective was entitled to qualified immunity because Steinhoff did not identify clearly established law "prohibiting the use of a takedown under the dynamic circumstances presented." Finally, the district court concluded that no reasonable jury could find that the Investigator intentionally hit Steinhoff with his rifle. Even if he accidentally hit Steinhoff, the district court determined that this unintentional use of force would not have been excessive and therefore granted summary judgment without reaching qualified immunity. Steinhoff appealed.

USE OF FORCE AND QUALIFIED IMMUNITY RULES AND GUIDELINES LISTED IN THIS CASE:

A. Court of Appeals reviews district court's award of summary judgment on qualified immunity grounds by examining facts anew and drawing all reasonable inferences in nonmoving party's favor. **B.** When officer invokes qualified immunity, burden falls to plaintiff to show not only that officer's conduct violated federal right, but also that right was clearly established at time of alleged violation. **C.** Fourth Amendment governs use of force during execution of search warrant. **D.** Officers

executing search warrant for contraband have authority to detain persons on premises during search to further certain law enforcement interests: officer safety, facilitating search's completion, and preventing flight. **E.** Inherent in the power to detain is the authority to use reasonable force to effectuate the detention. **F.** In evaluating Fourth Amendment excessive force claim, the court asks whether the officers' actions are objectively reasonable in light of the facts and circumstances confronting them. **G.** In determining the reasonableness of an officer's use of force in effecting an arrest, the court considers the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether he is actively resisting or attempting to evade detention by flight. **H.** The inquiry for determining whether an officer's use of force is objectively reasonable in light of the facts and circumstances confronting them accounts for the fact that police officers are often forced to make split-second judgments about the proper use of force in dynamic situations. **I.** A constitutional right is clearly established for purposes of qualified immunity if existing precedent places the statutory or constitutional question beyond debate; put another way, the law in place at the time of the challenged conduct must demonstrate that a reasonable official would understand that what he is doing violates that right. **J.** For a law to be clearly established for qualified immunity purposes in a Fourth Amendment excessive force case, the precedent at the time of challenged conduct must squarely govern the specific facts at issue because the use of excessive force is the area of the law in which the result depends very much on the facts of each case. **K.** A blow to head with a rifle may qualify as deadly use of force, for Fourth Amendment purposes, because it may pose substantial risk of serious bodily harm. **L.** An Officer cannot use deadly force against non-resisting suspect.

ISSUE #1: Did the District Court err in granting the Detective's motion for summary judgment concerning his use of force in tackling Steinhoff to the ground?

FINDINGS: According to the Court of Appeals, it was not clearly established at the time of the early morning raid to execute a search warrant for drugs across a large property where the officers expected to encounter armed, violent, or flight-ready individuals that the police detective's use of force to take down compliant alleged drug dealer violated Fourth Amendment, and thus the detective was entitled to qualified immunity from liability in suspect's § 1983 excessive force action.

ISSUE #2: Did the District Court err in granting the Investigator's motion for summary judgment concerning his use of force in striking Steinhoff with the barrel of his rifle?

FINDINGS: The Court of Appeals concluded that a genuine issue of material fact as to whether the Investigator intentionally hit Steinhoff on his head with his rifle as another officer tackled him precluded summary judgment on qualified immunity grounds in this case. Specifically, the Court held that a jury could find that the Investigator's rifle hit Steinhoff while he was standing, which was inconsistent with the Investigator's insistence that he only jumped into the fray once Steinhoff was on the ground. Steinhoff testified that he saw a rifle swing and hit him while he was still upright. The audible "clink" in the body-camera video could corroborate that the rifle made contact while he was standing. That the Investigator's rifle allegedly hit Steinhoff while he was standing, and with enough force to inflict a deep cut, further indicated that the blow may have been intentional.

ISSUE #3: Could the recorded comments of an Officer saying "[w]ell, don't take off—try to take off when we're giving you orders" after Steinhoff complained about being struck on the head with a rifle barrel help prove that the blow that caused a cut on Steinhoff's head that required nine stitches to close was intentionally delivered?

FINDINGS: The Court of Appeals declared that while it was unclear which officer made the comment, a jury could find that the officer, having seen the incident, implicitly acknowledged that the Investigator hit Steinhoff intentionally. In support of this ruling, the Court noted that case of *Miller v. Gonzalez*, 761 F.3d 822 (7th Cir. 2014), which held that a jury could conclude that an officer who jumped onto a suspect intended to injure them when he replied to the suspect's complaint, "I told you not to run."

CONCLUSION: The Court of Appeals affirmed the district court's entry of qualified immunity to the Detective concerning his tackle of Steinhoff and the corresponding denial of partial summary judgment for Steinhoff. However, it reversed the district court's entry of summary judgment for the Investigator based upon Steinhoff's complaint that the Investigator struck him with a rifle. Consequently, the Court remanded the case for further proceedings consistent with this opinion. A jury must decide if the Investigator intentionally struck Steinhoff; whether the force used by the Investigator, whether intentional or unintentional, was excessive, and whether the Investigator should be held liable for the force that was used against Steinhoff.

QUIZ QUESTIONS FOR THE MONTH OF AUGUST – 2026

Ryan Steinhoff v. Matthew Malovrh et al., 170 F.4th 647, March 24, 2026

1. In Illinois, “deadly force” is defined as “Force which is intended or likely to cause death or great bodily harm. [720 ILCS 5/7-1] As a general rule, is a law enforcement Officer authorized in using deadly force against a non-resisting suspect?
 - a. Yes.
 - b. No.

2. In cases of this type, Officers are often required to make “split-second judgments” concern the use of force. Courts take this fact into consideration when determining whether or not the force used by an Officer was reasonable.
 - a. True.
 - b. False.

3. In this case, the Court listed three considerations a Court will use when determining the reasonableness of an officer's use of force in effecting an arrest. Which one of the following is not one of those considerations?
 - a. The severity of crime at issue.
 - b. Whether the suspect poses an immediate threat to the safety of the officers or others.
 - c. The past criminal history of the suspect.
 - d. Whether the suspect is actively resisting or attempting to evade detention by flight.

4. An Officer was heard in this case responding to a complaint made by Steinhoff concerning being struck on his head by saying, “[w]ell, don't take off—try to take off when we're giving you orders.” The Court concluded that a jury could consider this statement when deciding whether or not the Investigator intentionally struck Steinhoff. In Illinois, does the reason why an Officer uses force against a suspect matter when considering whether the Officer’s use of force was legal?
 - a. Yes.
 - b. No.

QUIZ ANSWERS AND DISCUSSION FOR THE MONTH OF AUGUST – 2026

Ryan Steinhoff v. Matthew Malovrh et al., 170 F.4th 647, March 24, 2026

1. In Illinois, “deadly force” is defined as “Force which is intended or likely to cause death or great bodily harm. [720 ILCS 5/7-1] As a general rule, is a law enforcement Officer authorized in using deadly force against a non-resisting suspect?

b. **No.** As this court noted: “an officer cannot use deadly force against a non-resisting suspect.” See Gant v. Hartman, 924 F.3d 445, 451 (7th Cir. 2019).

2. In cases of this type, Officers are often required to make “split-second judgments” concern the use of force. Courts take this fact into consideration when determining whether or not the force used by an Officer was reasonable.

a. **True.** As the Court acknowledged: “The reasonableness inquiry also accounts for ‘the fact that police officers are often forced to make split-second judgments’ about the proper use of force in dynamic situations. This last observation is front and center of our analysis here because ‘the execution of a warrant to search for narcotics is the kind of transaction that may give rise to sudden violence or frantic efforts to conceal or destroy evidence.’ ” Michigan v. Summers, 452 U.S. 692, (1981).

3. In this case, the Court listed three considerations a Court will use when determining the reasonableness of an officer's use of force in effecting an arrest. Which one of the following is not one of those considerations?

c. **The past criminal history of the suspect.**

4. An Officer was heard in this case responding to a complaint made by Steinhoff concerning being struck on his head by saying, “[w]ell, don't take off—try to take off when we're giving you orders.” The Court concluded that a jury could consider this statement when deciding whether or not the Investigator intentionally struck Steinhoff. In Illinois, does the reason why an Officer uses force against a suspect matter when considering whether the Officer’s use of force was legal?

a. **Yes.** An Officer is prohibited from using force to punish or to retaliate. 720 ILCS 5/7-5.5(e)(1) That Section provides “(a) peace officer, or any other person acting under the color of law, shall not: (i) use force as punishment or retaliation.” Consequently, if an Officer uses force against a suspect for the purpose of inflicting punishment or for purposes of retaliation, then Illinois law declares that use of force to be illegal.