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No. _____

Supreme Court, U.S.
FILED

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OFFICE OF THE CLERK

**IN THE
SUPREME COURT OF THE UNITED STATES**

**CARSTEN JAMES QUINLAN,
Petitioner,**

v.

**WASHINGTON COUNTY, et al.,
Respondents.**

**ON PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT**

PETITION FOR WRIT OF CERTIORARI

**Carsten James Quinlan
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QUESTION PRESENTED

Whether a federal court may dismiss a pro se 42 U.S.C. § 1983 Fourth Amendment action at the Rule 12(b)(6) stage by treating probable cause as established from complaint exhibits, where the complaint alleges that the investigative evidence supporting probable cause was coerced, fabricated, materially incomplete, or contradicted by exculpatory facts.

LIST OF PARTIES

Petitioner Carsten James Quinlan was a plaintiff-appellant in the United States Court of Appeals for the Eighth Circuit.

The following parties are respondents in this Court under Supreme Court Rule 12.6 because they were parties to the proceeding in the court whose judgment is sought to be reviewed and are not named as petitioner:

Washington County; City of Woodbury; Kim Richardson; Hailey Dornfeld; Keshini Ratnayake; Tom Wedes; Mathew Stephenson; Chris Murphy; Unknown John and Jane Does; A.G.Q.; E.D.Q.; and L.E.Q.

A.G.Q., E.D.Q., and L.E.Q. are minor children and are identified only by initials. Petitioner proceeds pro se only on his own behalf and does not purport to represent the minor children in this Court.

No party is a publicly traded corporation.

Related Cases

Carsten J. Quinlan, et al. v. Washington County, City of Woodbury, Kim Richardson, and Hailey Dornfeld, No. 0:24-cv-02782-KMM-SGE, United States District Court for the District of Minnesota. Order granting motions to dismiss, denying leave to file a supplemental complaint, denying sanctions, and directing entry of judgment filed July 21, 2025.

Carsten James Quinlan, et al. v. Washington County, et al., No. 25-2661, United States Court of Appeals for the Eighth Circuit. Judgment entered March 17, 2026; rehearing en banc and panel rehearing denied April 22, 2026.

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Appendix D - Order of the United States District Court for the District of Minnesota granting motions to dismiss, denying leave to file a supplemental complaint, denying sanctions, and directing entry of judgment, filed July 21, 2025.

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IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

The opinion of the United States Court of Appeals for the Eighth Circuit appears at Appendix A and is unpublished. The Eighth Circuit filed that opinion on March 17, 2026.

The judgment of the United States Court of Appeals for the Eighth Circuit appears at Appendix B. The Eighth Circuit entered judgment on March 17, 2026, affirming the judgment of the district court.

The order denying rehearing en banc and panel rehearing appears at Appendix C. The Eighth Circuit denied rehearing on April 22, 2026.

The district court's order granting defendants' motions to dismiss, denying petitioner's motion for leave to file a supplemental complaint, and directing entry of judgment appears at Appendix D.

JURISDICTION

The United States Court of Appeals for the Eighth Circuit entered judgment on March 17, 2026. Petitioner timely sought rehearing and rehearing en banc. The court of appeals denied rehearing and rehearing en banc on April 22, 2026, and that order appears at Appendix C. Petitioner's original petition for a writ of certiorari was postmarked on July 21, 2026, within 90 days of the denial of rehearing. The Clerk returned the petition by letter dated August 14, 2026, for correction of form defects. This corrected petition is submitted within 60 days of the Clerk's letter and is timely under Supreme Court Rules 13.3 and 14.5. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. amend. IV:

“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause....”

U.S. Const. amend. XIV, § 1, in relevant part:

“No State shall ... deprive any person of life, liberty, or property, without due process of law....”

42 U.S.C. § 1983, in relevant part:

“Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State ... subjects, or causes to be subjected, any citizen of the United States ... to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured....”

28 U.S.C. § 1254(1):

“Cases in the courts of appeals may be reviewed by the Supreme Court by ... writ of certiorari granted upon the petition of any party to any civil or criminal case....”

STATEMENT OF THE CASE

Petitioner filed this pro se civil-rights action under 42 U.S.C. § 1983 against county and city actors and related officials, alleging that he was arrested, prosecuted, and otherwise subjected to unconstitutional state action on the basis of unreliable, coerced, fabricated, or materially incomplete investigative evidence. Petitioner also alleged related due-process injuries and sought to supplement the complaint with post-filing facts.

The district court dismissed the federal claims and denied petitioner leave to file a supplemental complaint. Petitioner then appealed to the United States Court of Appeals for the Eighth Circuit. Petitioner's appellate brief identified the district-court case as No. 0:24-cv-02782-KMM-SGE and stated that the district-court order dismissing all federal claims was entered on July 21, 2025.

In an unpublished per curiam opinion filed March 17, 2026, the Eighth Circuit affirmed. The court held that "the facts included in Quinlan's operative complaint and exhibits show his arrest was based on probable cause," that appellees "did not infringe on his due process rights," and that the proposed supplements would have been futile. The court cited *Brown v. City of St. Louis*, *Folkerts v. City of Waverly*, *Mitchell v. Dakota County Social Services*, and *Schriener v. Quicken Loans, Inc.* in support of those conclusions.

Petitioner timely sought rehearing and rehearing en banc. On April 22, 2026, the Eighth Circuit denied both requests. This petition follows.

REASONS FOR GRANTING THE PETITION

This case presents a recurring pleading-stage question in civil-rights litigation: when a pro se plaintiff attaches or incorporates investigative materials into a complaint, may a court use those materials to treat probable cause as conclusively established, despite allegations that the underlying evidence was coerced, fabricated, materially incomplete, or contradicted by exculpatory facts? The decision below answered that question yes, expressly holding that petitioner's "operative complaint and exhibits show his arrest was based on probable cause."

First, the decision below sharpens an important Rule 12(b)(6) problem. Complaint exhibits can help explain a pro se pleading, but using those exhibits to resolve contested inferences against the pleader turns a threshold pleading inquiry into a one-sided merits determination. Rule 14 directs petitioners to present "direct and concise" reasons for granting review, and Rule 10

recognizes that certiorari may be warranted when a lower court departs from accepted procedure or decides an important federal question requiring this Court's intervention. Petitioner's narrow submission is that the court below effectively treated attached materials as conclusive proof of probable cause at the threshold stage, despite contrary allegations in the pleading itself.

Second, the issue matters beyond this case, particularly for pro se § 1983 litigants. Pro se complaints are to be liberally construed, and pro se litigants often attach documents in an effort to explain their claims. If those materials can then be used to convert an otherwise plausible complaint into a dismissal on the theory that probable cause is established as a matter of law, attaching explanatory materials becomes a trap rather than an aid.

That problem matters because probable cause often depends on what investigating officials knew, omitted, or distorted, and those matters are ordinarily contested rather than conceded at the pleading stage. The Court's own certiorari criteria emphasize issues of broader importance, not merely error correction in one case.

Third, this case is a serviceable vehicle for the question presented because the Eighth Circuit expressly relied on the complaint and exhibits to hold that probable cause existed, and it separately held that petitioner's proposed supplements would have been futile. The court thus resolved the core threshold issue in a concise and explicit way.

The petition does not ask this Court to review every issue petitioner raised below. It asks only whether a court may dismiss a pro se Fourth Amendment § 1983 case at Rule 12(b)(6) by treating complaint exhibits as establishing probable cause despite allegations that the evidence supporting probable cause was unreliable, coerced, fabricated, materially incomplete, or contradicted by exculpatory facts.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



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Date: September 29, 2026