

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Sydney Williams v. Jamie L. Bramblett, in her individual capacity,
Glenn Curry, in his individual capacity, Angela Kramp, in her
individual capacity, Camelot Care Centers, LLC, Erin Helmholz, and
Kathy Henke

Case No. 22-cv-3090 (C.D. Ill. Jan. 5, 2026) · No. Case No. 22-cv-3090 · Decided January 5, 2026

SUMMARY

The court grants Defendants Glenn Curry’s and Angela Kramp’s motion for summary judgment in Sydney Williams’s action alleging Fourteenth Amendment due process violations under 42 U.S.C. § 1983 arising from her removal from her family and continued placement in state custody. The opinion reviews the DCFS investigation, medical evidence concerning suspected caregiver-fabricated illness, and related juvenile-court proceedings. The text also notes that claims against Jamie Bramblett had previously been dismissed or struck, while state-law claims against other defendants remained.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Colleen R. Lawless
JURISDICTION	U.S. District Court for the Central District of Illinois
DECIDED	January 5, 2026
DOCKET	Case No. 22-cv-3090
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 claim against Illinois Department of Children and Family Services supervisors Glenn Curry and Angela Kramp for alleged Fourteenth Amendment due-process violations arising from her removal from her parents and continued withholding from them. The defendants moved for summary judgment, asserting, among other defenses, qualified immunity. The court granted summary judgment on Count I and relinquished supplemental jurisdiction over the remaining state-law claims.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter

of law. The court viewed the evidence and drew reasonable inferences in favor of the nonmovant but did not weigh evidence, assess credibility, or rely on speculation or conjecture. Qualified-immunity review required determining whether each defendant violated a constitutional right and whether that right was clearly established with sufficient factual specificity.

PRECEDENTIAL VALUE

unknown

PARTIES

Sydney Williams v. Glenn Curry, Angela Kramp

TOPICS

qualified immunity

section 1983

due process

summary judgment

civil procedure

PRACTICE AREAS

civil rights

constitutional law

civil procedure

child welfare

QUESTIONS PRESENTED

1. Whether Glenn Curry and Angela Kramp violated Plaintiff's Fourteenth Amendment right to familial relations or due process by participating in the investigation, removal, and continued withholding of Plaintiff from her parents.
2. Whether Curry and Kramp were entitled to qualified immunity because Plaintiff failed to show a violation of a clearly established constitutional right.
3. Whether the court should retain supplemental jurisdiction over the remaining state-law claims after dismissing the federal claim.

HOLDINGS

1. Curry and Kramp were entitled to qualified immunity because Plaintiff did not demonstrate that they violated a constitutional right that was clearly established under materially similar circumstances.
2. An alleged failure to comply with state DCFS procedures, standing alone, did not establish a violation of Plaintiff's clearly established federal due-process rights.
3. The court declined to exercise supplemental jurisdiction over the remaining state-law claims after dismissing the federal claim.

KEY QUOTATIONS

"Summary judgment is appropriate if the motion is properly supported and "there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.""

"Qualified immunity is appropriate in those circumstances."

FACTUAL BACKGROUND

When Plaintiff was sixteen, DCFS investigated allegations that her parents were fabricating or inducing illness and seeking unnecessary medical treatment for her. The investigation relied on extensive medical records, reports from St. Louis Children's Hospital's child-protection team, evidence concerning THC and unapproved medications, and an affidavit stating that Plaintiff was at risk from caregiver-fabricated illness. Plaintiff was placed in protective custody pursuant to a juvenile-court order, and the juvenile court found probable cause of neglect and later determined that her parents were unfit. Curry and Kramp supervised or approved aspects of the investigation and safety plan, while Plaintiff alleged that they disregarded exculpatory medical information and violated her right to familial relations.

PROCEDURAL HISTORY

The case was filed in the Central District of Illinois. Plaintiff's claims against Jamie Bramblett were previously dismissed and struck, while state-law claims against Camelot Care Centers, LLC, Erin Helmholz, and Kathy Henke remained. After considering the summary-judgment motion filed by Curry and Kramp, the court held that the defendants were entitled to qualified immunity because Plaintiff did not establish violation of a clearly established constitutional right. Count I was dismissed with prejudice, the remaining state-law claims were dismissed without prejudice, and the case was ordered terminated upon entry of judgment.

DISPOSITION

dismissed

CASES CITED

- Biggs v. Chic. Bd. of Educ., 82 F.4th 554, 559 (7th Cir. 2023)
- Driveline Systems, LLC v. Arctic Cat, Inc., 936 F.3d 576, 579 (7th Cir. 2019)
- Harper v. C.R. England, Inc., 687 F.3d 297, 306 (7th Cir. 2012)
- Pearson v. California, 555 U.S. 223, 231 (2009)
- Harlow v. Fitzgerald, 457 U.S. 800, 818 (1982)
- Mabes v. Thompson, 136 F.4th 697, 705-10 (7th Cir. 2025)
- Anderson v. Creighton, 483 U.S. 635, 640 (1987)
- White v. Pauly, 580 U.S. 73, 79 (2017)
- Brokaw v. Mercer County, 235 F.3d 1000, 1018-23 (7th Cir. 2000)
- Doe v. Heck, 327 F.3d 492, 520, 525-26 (7th Cir. 2003)
- Dupuy v. Samuels, 397 F.3d 493, 503-09 (7th Cir. 2005)
- Ault v. Speicher, 634 F.3d 942, 947 (7th Cir. 2011)
- Kemp v. Liebel, 877 F.3d 346, 348 (7th Cir. 2017)
- BeVier v. Hucal, 806 F.2d 123, 126-29 (7th Cir. 1986)
- Hernandez ex rel. Hernandez v. Foster, 657 F.3d 463, 476-77 (7th Cir. 2011)
- Burritt v. Ditlefsen, 807 F.3d 239, 252 (7th Cir. 2015)

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