

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Patrick Justi v. Lt. R. Davis, Lt. J. Bruce, Lt. F. Madison, John/Jane
Doe 1, John/Jane Doe 2, and John/Jane Doe 3

Justi · No. 25-cv-01345-SPM · Decided January 6, 2026

SUMMARY

The United States District Court for the Southern District of Illinois grants Patrick Justi leave to proceed in forma pauperis in his 42 U.S.C. § 1983 action. The court allows a First Amendment retaliation claim against Lieutenant F. Madison to proceed, while dismissing without prejudice the due process, equal protection, state-law, and PREA claims and terminating the other defendants. The court also denies Justi’s motion for recruitment of counsel.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Stephen P. McGlynn
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	January 6, 2026
DOCKET	25-cv-01345-SPM
DISPOSITION	other
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983; the court conducted preliminary screening under 28 U.S.C. § 1915(e)(2)(B), granted leave to proceed in forma pauperis, allowed one retaliation claim to proceed, dismissed the remaining claims without prejudice, and denied recruitment of counsel.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an IFP action that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. For failure to state a claim, the complaint must plead enough facts to state a plausible claim for relief. The court also applied the plausibility and personal-involvement standards governing pleading against unidentified defendants.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; persuasive value only.

TOPICS

section 1983 prisoners rights first amendment procedural due process equal protection

PRACTICE AREAS

civil rights litigation prisoner civil rights constitutional law federal civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's allegations plausibly stated a First Amendment retaliation claim against Madison.
2. Whether Plaintiff stated a Fourteenth Amendment procedural due process claim based on the disciplinary report and alleged loss or modification of good-time-related benefits.
3. Whether Plaintiff stated a class-of-one equal protection claim against Davis, Bruce, and Madison.
4. Whether Plaintiff could pursue claims under state law or the Prison Rape Elimination Act through § 1983.
5. Whether the grouped and unidentified Doe defendants were sufficiently connected to specific unconstitutional conduct.
6. Whether Plaintiff was entitled to proceed in forma pauperis and to recruitment of counsel.

HOLDINGS

1. The allegations that Plaintiff complained about sexual harassment and safety concerns, was placed in restrictive housing, and received a fabricated disciplinary ticket were sufficient at the screening stage to allow Count 1 to proceed against Madison.
2. Count 2 failed to state a Fourteenth Amendment procedural due process claim because Plaintiff did not allege that he was denied the procedural protections required for a constitutionally valid disciplinary hearing.
3. Count 3 failed to state a class-of-one equal protection claim because Plaintiff alleged only that he was treated differently from similarly situated inmates without facts showing intentional differential treatment or the absence of a rational basis.
4. Count 4 failed because § 1983 does not provide a means to enforce unspecified state-law violations and PREA does not create a private right of action for prisoners to sue officials for noncompliance with the Act.
5. The grouped John/Jane Doe defendants were dismissed because Plaintiff did not identify particular individuals or allege specific conduct connecting them to constitutional violations; John/Jane Doe 1 was also dismissed because no allegations concerned that defendant.

KEY QUOTATIONS

“To succeed on a First Amendment retaliation claim, Plaintiff must show “that (1) he engaged in activity protected by the First Amendment; (2) he suffered a deprivation that would likely deter First Amendment

activity in the future; and (3) the First Amendment activity was ‘at least a motivating factor’ in the Defendants’ decision to take the retaliatory action.”” (Count 1)

“Adequate procedural due process “affecting the length of [a] carceral sentence, like a reduction in good-time credits” requires (1) advanced written notice of the charge against him; (2) the right to appear before an impartial hearing panel; (3) the right to call witnesses and present documentary evidence if prison safety allows; and (4) a written statement of the reasons for the discipline imposed.” (Count 2)

“PREA “does not give prisoners a personal right to sue for an official’s failure to comply with the Act’s requirements.”” (Count 4)

FACTUAL BACKGROUND

While incarcerated at Big Muddy River Correctional Center, Patrick Justi told Lieutenants Davis, Bruce, and Madison that he feared for his physical and sexual safety because his cellmate was masturbating compulsively in their shared cell. After Justi refused housing and was placed in restrictive housing, Madison allegedly issued him a false disciplinary report, resulting in a finding that he disobeyed a safety-related direct order and in the loss or modification of good-time-related benefits. The Administrative Review Board later found the safety-related charge unsubstantiated and directed that the restrictive-housing sanction be deleted, but Justi alleged that the disciplinary matter affected his Culinary Arts Earn Good Conduct Contract. He also alleged that officials ignored or covered up his PREA complaint and treated him differently from similarly situated inmates.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 complaint and motions to proceed in forma pauperis and for recruitment of counsel. The court found Plaintiff indigent, screened the complaint, permitted Count 1 against Defendant Madison to proceed, dismissed Counts 2, 3, and 4 without prejudice, dismissed the Doe defendants and other defendants without prejudice or terminated them as parties, granted IFP status, and denied the motion for recruitment of counsel.

DISPOSITION

other

CASES CITED

- Hoskins v. Poelstra, 320 F.3d 761, 763 (7th Cir. 2003)
- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Corgain v. Miller, 708 F.2d 1241, 1247 (7th Cir. 1983)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Lucien v. Roegner, 682 F.2d 625, 626 (7th Cir. 1982)
- Brooks v. Ross, 578 F.3d 574, 580 (7th Cir. 2009)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Collins v. Kibort, 143 F.3d 331, 334 (7th Cir. 1998)
- Bridges v. Gilbert, 557 F.3d 541, 546 (7th Cir. 2009)

- Massey v. Johnson, 457 F.3d 711, 716 (7th Cir. 2006)
- Isby v. Brown, 856 F.3d 508, 524 (7th Cir. 2017)
- Hess v. Bd. of Trs. of S. Ill. Univ., 839 F.3d 668, 673 (7th Cir. 2016)
- Torres v. Brookman, 155 F. 4th 952, 956 (7th Cir. 2025)
- Edwards v. Balisok, 520 U.S. 641, 648 (1997)
- Heck v. Humphrey, 512 U.S. 477, 480-81 (1994)
- McAtee v. Cowan, 250 F.3d 506, 508 (7th Cir. 2001)
- Morgan v. Schott, 914 F.3d 1115, 1120 (7th Cir. 2019)
- Ealy v. Watson, 109 F. 4th 958, 965 (7th Cir. 2024)
- Wolff v. McDonnell, 418 U.S. 539, 563-69 (1974)
- Black v. Lane, 22 F.3d 1395, 1402 (7th Cir. 1994)
- Village of Willowbrook v. Olech, 528 U.S. 562, 564 (2000)
- Wozniak v. Adesida, 932 F.3d 1008, 1011 (7th Cir. 2019)
- Scott v. Edinburg, 346 F.3d 752, 760 (7th Cir. 2003)
- Summers v. Waggoner, No. 19-cv-01338-SMY, 2020 WL 6321488, at *3 (S.D. Ill. Oct. 28, 2020)
- Kadamovas v. Stevens, 706 F.3d 843, 845 (7th Cir. 2013)
- Pruitt v. Mote, 503 F.3d 647, 654 (7th Cir. 2007)