

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, SPRINGFIELD DIVISION

Charles Flynn v. Natasha Lawson, et al.

No. 3:25-cv-03385-MMM (C.D. Ill. Apr. 23, 2026) · No. 3:25-cv-03385-MMM · Decided April 23, 2026

SUMMARY

The United States District Court for the Central District of Illinois dismissed Charles Flynn’s amended complaint without prejudice after screening under 28 U.S.C. § 1915A. The court found that the complaint was not short and plain, improperly joined unrelated claims and defendants, and failed to state constitutional claims concerning prison conditions, investigation requests, disciplinary proceedings, and alleged staff misconduct. The court granted Flynn 28 days to seek leave to amend with a proposed amended complaint.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	April 23, 2026
DOCKET	3:25-cv-03385-MMM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights complaint dismissed without prejudice at mandatory screening under 28 U.S.C. § 1915A, with leave to seek amendment.
STANDARD OF REVIEW	At § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff's favor, but dismisses claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. The pleading must contain enough factual matter to state a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential

TOPICS

- pleadings
- joinder
- prisoners rights
- due process
- civil procedure

PRACTICE AREAS

prisoner civil rights

federal civil procedure

constitutional due process

QUESTIONS PRESENTED

1. Whether the amended complaint stated a claim for relief under 28 U.S.C. § 1915A.
2. Whether the complaint complied with Federal Rule of Civil Procedure 8(a)(2)'s short-and-plain-statement requirement.
3. Whether the complaint improperly joined unrelated claims and defendants under Federal Rules of Civil Procedure 18 and 20.
4. Whether the allegations concerning state FOIA requests, the Prison Rape Elimination Act, failure to investigate or bring criminal charges, prison staff conduct, and disciplinary punishment stated federal constitutional claims.
5. Whether plaintiff should be allowed to amend after dismissal.

HOLDINGS

1. The amended complaint failed to provide a short and plain statement giving defendants fair notice of the claims and therefore did not comply with Rule 8(a)(2).
2. The complaint improperly combined unrelated claims concerning different events and defendants; any amended complaint must comply with the joinder requirements of Rules 18 and 20.
3. The complaint failed to state a federal claim and was subject to dismissal without prejudice under 28 U.S.C. § 1915A.
4. The alleged failures by prison officials and state police to investigate the inmate assault or pursue criminal charges did not state a constitutional claim because there is no freestanding constitutional right to such an investigation or to criminal charges against another person.
5. The alleged violation of an internal prison no-contact order did not, without more, establish a constitutional violation.
6. The allegations concerning plaintiff's disciplinary ticket, hearing, reduced privileges, and seven days of segregation did not state a due-process claim because plaintiff did not allege an atypical and significant hardship, extended segregation, loss of good-time credits, or another comparable deprivation of liberty.
7. The allegations concerning FOIA requests to state agencies and the Prison Rape Elimination Act did not state a federal cause of action.

KEY QUOTATIONS

"A claim is legally insufficient if it "(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.""

"The Federal Rules of Civil Procedure require that the plaintiff submit a short and plain statement of the claim showing that the pleader is entitled to relief."

“To be precise: a plaintiff may put in one complaint every claim of any kind against a single defendant, per Rule 18(a), but a complaint may present claim #1 against Defendant A, and claim #2 against Defendant B, only if both claims arise ‘out of the same transaction, occurrence, or series of transactions or occurrences.’”

“Plaintiff’s pleadings are neither short nor plain, and so do not meet the requirements of Rule 8.”

“A violation of a prison directive, rule, administrative code, or even a state law does not on its own indicate or necessarily support an inference that a violation of the United States Constitution occurred.”

“To allege a deprivation of liberty sufficient to warrant due process protections, an extended period in segregation, the loss of good time credits, or some other atypical and extreme additional conditions of confinement must have been imposed.”

FACTUAL BACKGROUND

Plaintiff alleged that another inmate attacked him, that he was nevertheless disciplined with reduced privileges and seven days in segregation, and that prison officials failed to investigate or punish the attacker. He also alleged that officials later seated him next to the same inmate despite a no-contact order, that a guard made a coarse statement and another guard kicked or stepped on the backs of his shoes, and that officials failed to investigate stolen property. The complaint also raised issues involving state FOIA requests and the Prison Rape Elimination Act.

PROCEDURAL HISTORY

Plaintiff submitted a thirty-two-page amended complaint asserting claims concerning an inmate assault, prison discipline, alleged violations of a no-contact order, prison staff conduct, stolen property, investigations, state FOIA requests, and the Prison Rape Elimination Act. The court screened the pleading under 28 U.S.C. § 1915A and concluded that it failed to state a federal claim, was not short and plain, and improperly joined unrelated claims and defendants. The court dismissed without prejudice and allowed plaintiff 28 days to file a motion for leave to amend with a proposed amended complaint.

DISPOSITION

dismissed

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- George v. Smith, 507 F.3d 605, 609 (7th Cir. 2007)
- Ross Brothers Const. Co., Inc. v. International Steel Services, Inc., 283 F.3d 867, 872 (7th Cir. 2002)
- Davis v. Ruby Foods, Inc., 269 F.3d 818, 820 (7th Cir. 2001)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Mitchell v. Kallas, 895 F.3d 492, 502-03 (7th Cir. 2018)

- Wheeler v. Wexford Health Sources, Inc., 689 F.3d 680, 683 (7th Cir. 2012)
- Owens v. Godinez, 860 F.3d 434, 436 (7th Cir. 2017)
- Morris v. Kulhan, 745 F. App'x 648, 649 (7th Cir. 2018)
- Belk v. Watson, No. 19-CV-00499-JPG, 2019 WL 2188905, at *3 (S.D. Ill. May 21, 2019)
- Closson v. Kohlhepp, No. 21-cv-772, 2021 WL 3363139, at *2 (S.D. Ind. Aug. 3, 2021)
- Earl v. Racine Cty. Jail, 718 F.3d 689, 691 (7th Cir. 2013)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF ILLINOIS SPRINGFIELD
DIVISION CHARLES FLYNN,)) Plaintiff,)) v.) 3:25-cv-03385-MMM) NATASHA
LAWSON, et al.,)) Defendants.) ORDER Plaintiff, proceeding pro se, seeks to allege claims in
this Court.

The Court must “screen” Plaintiff’s complaint, and through such process identify and dismiss any legally insufficient claim, or the entire action if warranted. 28 U.S.C. § 1915A. A claim is legally insufficient if it “(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.” *Id.* The Court accepts the factual allegations as true, liberally construing them in the plaintiff’s favor.

Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013). Conclusory statements and labels are insufficient—the facts alleged must “state a claim for relief that is plausible on its face.” *Alexander v. United States*, 721 F.3d 418, 422 (7th Cir. 2013) (citation omitted). Allegations Plaintiff’s names twenty Defendants including state police officials and prison officials.

He alleges several sets of facts that are not clearly connected. One set of allegations relates to a fight with another inmate. In that set of allegations Plaintiff alleges another inmate attacked him. Plaintiff was not an aggressor in the fight. He was disciplined for the fight anyway and punished with reduced privileges and seven days segregation confinement.

A no contact order was put in place so the inmate who attacked him would not be near him. Plaintiff alleges the assault was not properly investigated, the person who assaulted him was not properly punished or criminally charged. An officer violated the no contact order by placing Plaintiff and the person who attacked him next to each other at a meal, and telling Plaintiff they would not be separated and should “fight or fuck.” There was no physical altercation.

Another allegation relates to a guard kicking or stepping on the back of Plaintiff’s shoes as he left the dietary hall one day. Another allegation relates to a different inmate stealing Plaintiff’s property and prison officials failing to properly investigate the matter. There may be other allegations woven into Plaintiff’s thirty-two page amended complaint, which is densely handwritten, but these are the apparent allegations.

Pleading Standards “Only persons who cause or participate in [constitutional] violations are responsible.” *George v. Smith*, 507 F.3d 605, 609 (7th Cir. 2007). The Federal Rules of Civil Procedure require that the plaintiff submit a short and plain statement of the claim showing that the pleader is entitled to relief. Fed. R. Civ. P. 8(a)(2).

The Seventh Circuit has consistently noted that the essential function of a complaint under the civil rules... is to put the defendant on notice of the plaintiff’s claim. *Ross Brothers Const. Co., Inc. v. International Steel Services, Inc.*, 283 F.3d 867, 872 (7th Cir. 2002) (quoting *Davis v. Ruby Foods, Inc.*, 269 F.3d 818, 820 (7th Cir. 2001)). While it is not necessary for a plaintiff to plead specific facts, *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007), “[t]hreadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice.” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2007) (citing *Twombly*, 550 U.S. at 555) (observing that courts “are not bound to accept as true a legal conclusion couched as a factual allegation”).

Joinder of Claims “A prisoner may join Defendants in the same action only if the claims against each one ‘aris[e] out of the same transaction, occurrence, or series of transactions or occurrences’” *Mitchell v. Kallas*, 895 F.3d 492, 502–03 (7th Cir. 2018) (quoting Fed. R. Civ. P. 20(a)(2)). “Joinder that requires the inclusion of extra parties is limited to claims arising from the same transaction or series of related transactions.” *Wheeler v. Wexford Health Sources, Inc.*, 689 F.3d 680, 683 (7th Cir.

2012). “To be precise: a plaintiff may put in one complaint every claim of any kind against a single defendant, per Rule 18(a), but a complaint may present claim #1 against Defendant A, and claim #2 against Defendant B, only if both claims arise ‘out of the same transaction, occurrence, or series of transactions or occurrences.’” *Wheeler v. Wexford Health Sources, Inc.*, 689 F.3d 680, 683 (7th Cir.

2012) (quoting Rule 20(a)(1)(A)). “[D]istrict courts should not allow inmates to flout the rules for joining claims and Defendants, see Fed. R. Civ. P. 18, 20, or to circumvent the Prison Litigation Reform Act’s fee requirements by combining multiple lawsuits into a single complaint.” *Owens v. Godinez*, 860 F.3d 434, 436 (7th Cir. 2017).

The Seventh Circuit “target[s] for dismissal ‘omnibus’ complaints—often brought by repeat players—that raise claims about unrelated conduct against unrelated Defendants.” *Mitchell*, 895 F.3d at 503. However, “judges may sever unrelated claims into separate suits (rather than dismiss the claims) if the statute of limitations has otherwise lapsed.” *Morris v. Kulhan*, 745 F. App’x 648, 649 (7th Cir.

2018). Finally, even claims that are properly joined may be severed in an exercise of the Court’s discretion, where doing so would be in the interests of justice and would promote the efficient and effective resolution of all claims. Analysis Plaintiff’s pleadings are neither short nor plain, and so

do not meet the requirements of Rule 8. Plaintiff also does not allege the direct personal involvement of many of the Defendants that he has named.

These pleading deficiencies call for dismissal of the amended complaint. Plaintiff's pleadings also appear to run counter to the joinder rules. Plaintiff tries to combine issues that are unrelated to one another. If he moves to amend, any proposed amended complaint must comply with the joinder rules described above. If Plaintiff wants to sue different Defendants about things that happened on different days, he needs to file separate lawsuits to do so.

Substantively, Plaintiff's allegations also do not state a claim. Plaintiff discusses various issues regarding Freedom of Information Act requests he made to state officials. There is no private right of action in federal court for issues regarding FOIA requests to state agencies. See *Belk v. Watson*, No. 19-CV-00499-JPG, 2019 WL 2188905, at *3 (S.D. Ill. May 21, 2019).

Likewise, the Prison Rape Elimination Act does not allow for a private lawsuit. See *Closson v. Kohlhepp*, No. 21-cv-772, 2021 WL 3363139, at *2 (S.D. Ind. Aug. 3, 2021). As to Plaintiff's allegations that the Illinois State Police and prison investigators did not respond properly to his requests for an investigation of the attack he suffered, the Court fully appreciates Plaintiff's frustration.

But there is no free-standing constitutional right to an investigation by prison officials or the state police after an occurrence like the fight that Plaintiff was injured in, nor is there a constitutional right for criminal charges to be filed against a wrongdoer. There is no allegation here that any prison official knew that Plaintiff was facing an imminent risk of serious harm and could have done anything about it before Plaintiff was attacked.

Plaintiff alleges that later, prison guards allowed an internal prison no contact order to be violated by allowing or causing Plaintiff and the person who previously attacked him to be seated next to one another at a meal. But there is no indication that Plaintiff was attacked or injured again, nor that there was any other harm done at that time. A violation of a prison directive, rule, administrative code, or even a state law does not on its own indicate or necessarily support an inference that a violation of the United States Constitution occurred.

Plaintiff alleges a prison guard said Plaintiff had to "fight or fuck." And he alleges that on another occasion a guard stepped on or kicked at the backs of his shoes. These are unpleasant allegations but alone do not spell out a violation of the constitution. Coarse language and minor affronts such as the issue with the stepping on or kicking at shoes are not ideal behavior by corrections staff.

But every affront, inconvenience, or unpleasantness experienced in prison is not the basis for a federal lawsuit, particularly where, as here, Plaintiff has not alleged that he was injured or harmed as a result of these actions by corrections staff.

As to Plaintiff's allegations that he received a wrongful disciplinary ticket, that the disciplinary hearing was effected without proper process, and that Plaintiff was wrongfully punished, none of these allegations state a claim for relief, because Plaintiff has not alleged that the punishment that he received rose to a level protected by the due process clause of the Constitution.

Plaintiff is already in prison. His liberty is almost completely curtailed based on his criminal sentence. To allege a deprivation of liberty sufficient to warrant due process protections, an extended period in segregation, the loss of good time credits, or some other atypical and extreme additional conditions of confinement must have been imposed. Otherwise, there is no entitlement to due process because there is no cognizable deprivation of liberty over and above Plaintiff's already lawfully much-curtailed liberty.

Earl v. Racine Cty. Jail, 718 F.3d 689, 691 (7th Cir. 2013). Again, the Court takes seriously Plaintiff's allegation that he was attacked by another prisoner, and understands how upset Plaintiff is that after that experience, he was disciplined, that he does not believe the issue was properly investigated, and that he experienced additional issues that he believes are unfair.

But accepting all those things as true, Plaintiff's allegations do not state a federal claim. IT IS THEREFORE ORDERED: 1. Pursuant to its merit review of the Complaint under 28 U.S.C. § 1915A, the Court finds that Plaintiff has failed to state a claim for relief. Plaintiff's remaining allegations are too vague and non-specific to put any Defendant on notice of a federal claim.

Plaintiff's Complaint is DISMISSED without prejudice for failure to state a claim. 2. The Court will allow Plaintiff the opportunity to file a motion for leave to amend with an attached proposed Amended Complaint, within 28 days of this Order. Failure to file an Amended Complaint will result in the dismissal of this case, without prejudice, for failure to state a claim.

Entered this 23rd day of April, 2026. s/Michael M. Mihm MICHAEL M. MIHM UNITED STATES DISTRICT JUDGE