

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PRECEDENTIAL VALUE	unpublished district court order; nonprecedential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)

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