

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
ILLINOIS

Stanton v. Easter, et al.

Stanton v. Easter · No. 26-cv-62-NJR · Decided April 13, 2026

SUMMARY

The United States District Court for the Southern District of Illinois conducts preliminary screening under 28 U.S.C. § 1915A of Randall J. Stanton’s Second Amended Complaint alleging unconstitutional searches and seizures, retaliation, malicious prosecution, conspiracy, forfeiture without due process, municipal liability, inadequate medical care, and denial of access to the courts. The court allows some retaliation and conspiracy claims to proceed, dismisses other claims with or without prejudice based on pleading deficiencies and immunity, and severs the medical-care and access-to-courts claims into a new case. The order also addresses Stanton’s motion for temporary and preliminary injunctive relief concerning his ongoing criminal proceedings.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of Illinois                                                                                                                                                                                                                                                                                                                                                                                              |
| WRITING FOR THE COURT | Nancy J. Rosenstengel                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| JURISDICTION          | United States District Court for the Southern District of Illinois                                                                                                                                                                                                                                                                                                                                                                                              |
| DECIDED               | April 13, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| DOCKET                | 26-cv-62-NJR                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE    | Preliminary screening of a prisoner's Second Amended Complaint under 28 U.S.C. § 1915A, together with consideration of a motion for temporary restraining order and preliminary injunction.                                                                                                                                                                                                                                                                     |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915A, the Court must dismiss any portion of a prisoner complaint that is frivolous, malicious, fails to state a claim, or seeks damages from an immune defendant. At the pleading stage, allegations are construed in the plaintiff's favor and must satisfy the plausibility standard under Bell Atlantic Corp. v. Twombly. The motion for injunctive relief was evaluated under the Younger abstention doctrine and its narrow exceptions. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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## PARTIES

Randall J. Stanton v. Officer Easter, Abigail Dinn, Daniel Cockrum, Sheriff Kyle Bacon, Gerry Poole, Captain Marie Hall, John Doe Correctional Officer, Jane Doe Correctional Officer, Jane Doe Jill from Pretrial Services, Officer Michelle, John Doe, Tim Hall, Illinois State Trooper Payne

## TOPICS

section 1983 fourth amendment first amendment injunctions civil procedure

## PRACTICE AREAS

civil rights constitutional law criminal procedure civil procedure remedies

## QUESTIONS PRESENTED

1. Whether the Second Amended Complaint plausibly stated Fourth Amendment claims based on the traffic stop, vehicle search, seizure of personal items, and search of Stanton's home.
2. Whether Stanton plausibly stated a First Amendment retaliation claim based on alleged harassment, searches, and arrests following his invocation of his right to counsel.
3. Whether Stanton could pursue a § 1983 malicious-prosecution and fabricated-evidence claim while the underlying criminal proceedings remained ongoing and against prosecutors and a testifying officer.
4. Whether Stanton's due-process claim concerning the seizure and forfeiture of \$840 was barred by the availability of an adequate state post-deprivation remedy and prosecutorial immunity.
5. Whether Stanton plausibly alleged a § 1983 conspiracy and a Monell claim based on alleged retaliatory conduct and recurring K9-related vehicle searches.
6. Whether the medical-care and access-to-courts claims were improperly joined with the claims concerning the drug-task-force conduct and should be severed.
7. Whether Younger abstention barred Stanton's request for a temporary restraining order and preliminary injunction interfering with ongoing state criminal proceedings and bond decisions.

## HOLDINGS

1. The allegations plausibly stated that Easter and Payne initiated the traffic stop and searched Stanton's vehicle without reasonable suspicion or probable cause, and that they seized his personal items, so the claim could proceed at the screening stage.
2. The allegation that the search warrant listed the correct address but omitted Stanton's name did not plausibly establish a Fourth Amendment violation, and the home-search portion of Count 1 was dismissed.
3. Stanton plausibly stated a First Amendment retaliation claim against Easter based on allegations that Easter threatened and subjected him to stops, searches, arrests, and other harassment after Stanton obtained counsel and invoked his right to counsel.

4. Count 3 failed because Stanton's criminal case was ongoing and because the prosecutors and testifying officer were protected by absolute immunity for the alleged prosecutorial and testimonial conduct; the count was dismissed with prejudice.
5. Count 4 was dismissed with prejudice because the prosecutors were absolutely immune and Illinois provided an adequate post-deprivation remedy for challenging the forfeiture.
6. Stanton plausibly stated a conspiracy-to-retaliate claim against Easter, Hall, Payne, Officer Michelle, and the John Doe officer, but failed to state a claim against Dinn, Cockrum, and Jane Doe Jill from Pretrial Services.
7. Stanton failed to plausibly allege that a policy, custom, or practice attributable to Sheriff Bacon was the moving force behind a constitutional violation, so Count 6 was dismissed without prejudice.
8. Counts 7 and 8 were improperly joined with Counts 1 through 6 because they involved different facts, defendants, and legal theories; the Court severed them into a new case.
9. The request for injunctive relief was denied because the requested intervention in ongoing state criminal proceedings and bond decisions was barred by Younger abstention, and no narrow exception applied.

#### KEY QUOTATIONS

*“In order to state a viable retaliation claim in Count 2, Stanton must allege 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 2)*

*“In order to allege a malicious prosecution claim under 42 U.S.C. § 1983, Stanton must allege that the “criminal prosecution (1) was instituted without probable cause; (2) for a malicious motive—a purpose other than bringing the defendant to justice; and (3) ended without a conviction.”” (Count 3)*

*“To establish conspiracy liability in a [Section] 1983 claim, the plaintiff must show that (1) the individuals reached an agreement to deprive him of his constitutional rights, and (2) overt acts in furtherance actually deprived him of those rights.” (Count 5)*

*“The exceptions are meant to be narrow.” (Motion for Injunctive Relief)*

#### FACTUAL BACKGROUND

Stanton alleged that law-enforcement officers conducted pretextual traffic stops and vehicle and home searches, seized his property, retaliated against him after he obtained counsel and stopped acting as a confidential informant, and pursued criminal charges through fabricated evidence. He also alleged that prosecutors and an officer presented false information during the criminal proceedings, that officers conspired against him, and that a sheriff maintained a policy involving pretextual K9 alerts. Separate allegations concerned improper medication, denial of medical care, and a thirty-day restriction on jail communications. The underlying state criminal proceedings remained ongoing when the federal court ruled.

#### PROCEDURAL HISTORY

Stanton filed an action under 42 U.S.C. § 1983 while a pretrial detainee. His original complaint was dismissed for failure to state a claim, and he was granted leave to amend. The Court reviewed the Second Amended Complaint, allowed some claims to proceed, dismissed some claims with or without prejudice, severed the medical-care and access-to-courts claims into a new action, denied injunctive relief, and stayed the remaining action under Younger abstention.

## DISPOSITION

other

## CASES CITED

- United States v. Yang, 39 F.4th 893, 899 (7th Cir. 2022)
- United States v. Price, 28 F.4th 739, 748 (7th Cir. 2022)
- United States v. Cole, 21 F.4th 421, 427 (7th Cir. 2021) (en banc)
- Huff v. Reichert, 744 F.3d 999, 1004 (7th Cir. 2014)
- United States v. Riley, 493 F.3d 803, 808 (7th Cir. 2007)
- United States v. McMillian, 786 F.3d 630, 639-40 (7th Cir. 2015)
- Maryland v. Garrison, 480 U.S. 79, 84 (1987)
- Steele v. United States, 267 U.S. 498, 503 (1925)
- United States v. Kelly, 772 F.3d 1072, 1081 (7th Cir. 2014)
- Jones v. Wilhelm, 425 F.3d 455, 462-63 (7th Cir. 2005)
- Lewis v. City of Chicago, 914 F.3d 472, 478 (7th Cir. 2019)
- Bridges v. Gilbert, 557 F.3d 541, 546 (7th Cir. 2009)
- Friedl v. City of New York, 210 F.3d 79, 85 (2d Cir. 2000)
- Williams v. Mitchell, 122 F.4th 85, 89 (4th Cir. 2024)
- Evans v. Matson, No. 23-2954, 2024 WL 2206638, at \*2 (7th Cir. May 16, 2024)
- Thompson v. Clark, 596 U.S. 36, 44, 49 (2022)
- McDonough v. Smith, 588 U.S. 109, 117-18 (2019)
- Bianchi v. McQueen, 818 F.3d 309, 316 (7th Cir. 2016)
- Fields v. Wharrie, 672 F.3d 505, 510, 512 (7th Cir. 2012)
- Kincaid v. Eberle, 712 F.2d 1023, 1023-24 (7th Cir. 1983)
- Curtis v. Bembenek, 48 F.3d 281, 284-85 (7th Cir. 1995)
- Murdock v. Washington, 193 F.3d 510, 513 (7th Cir. 1999)
- Hudson v. Palmer, 468 U.S. 517, 530-36 (1984)
- Robinson v. Winslow, 88 F. App'x 93, 95-96 (7th Cir. 2004)
- Jones v. City of Chicago, 856 F.2d 985, 992 (7th Cir. 1988)
- Smith v. Gomez, 550 F.3d 613, 617 (7th Cir. 2008)
- Beaman v. Freesmeyer, 776 F.3d 500, 510 (7th Cir. 2015)

- Estate of Sims ex rel. Sims v. County of Bureau, 506 F.3d 509, 517 (7th Cir. 2007)
- Stockton v. Milwaukee County, 44 F.4th 605, 617 (7th Cir. 2022)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Thomas v. Cook County Sheriff's Department, 604 F.3d 293, 306 (7th Cir. 2010)
- Woodward v. Correctional Medical Services of Illinois, Inc., 368 F.3d 917, 927 (7th Cir. 2004)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Owens v. Hinsley, 635 F.3d 950, 952 (7th Cir. 2011)
- Younger v. Harris, 401 U.S. 37 (1971)
- Tobey v. Chibucos, 890 F.3d 634, 651 (7th Cir. 2018)
- Stroman Realty, Inc. v. Martinez, 505 F.3d 658, 664 (7th Cir. 2007)
- Jacobson v. Village of Northbrook Municipal Corp., 824 F.2d 567, 569-70 (7th Cir. 1987)
- Mulholland v. Marion County Election Board, 746 F.3d 811, 818 (7th Cir. 2014)
- Harris v. Ruthenberg, 62 F. Supp. 3d 793, 800 (N.D. Ill. 2014)