

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Jeffrey L. Smith v. John/Jane Does, et al.

Smith v. Does · No. 25-3324 · Decided February 2, 2026

SUMMARY

The United States District Court for the Central District of Illinois dismissed Jeffrey L. Smith’s pro se Section 1983 complaint without prejudice under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A. The court held that HIPAA does not provide a private right of action and that negligence or medical malpractice allegations did not state a constitutional claim, while noting the requirements for an Illinois medical malpractice claim. The court granted Plaintiff 30 days to file a complete amended complaint and directed the Clerk to provide a Section 1983 complaint form.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois
DECIDED	February 2, 2026
DOCKET	25-3324
DISPOSITION	dismissed
PROCEDURAL POSTURE	Merit review of a pro se prisoner's complaint under 42 U.S.C. § 1983 pursuant to 28 U.S.C. § 1915A.
STANDARD OF REVIEW	On § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff's favor, but conclusory statements and labels are insufficient; the complaint must state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jeffrey L. Smith v. John/Jane Does, et al.

TOPICS

- section 1983
- hipaa
- medical records privacy
- motions to dismiss
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the complaint stated a viable § 1983 claim based on alleged HIPAA or confidentiality violations.
2. Whether allegations of negligence or gross negligence were sufficient to state a claim under § 1983.
3. Whether the complaint stated a medical-malpractice claim without compliance with the Illinois Healing Arts Malpractice statute.
4. Whether the complaint should be dismissed under Rule 12(b)(6) and 28 U.S.C. § 1915A.

HOLDINGS

1. HIPAA does not provide a private right of action, so alleged HIPAA violations did not state a viable claim.
2. Negligence, including gross negligence, is insufficient to support a § 1983 claim.
3. A medical-malpractice claim under Illinois law requires compliance with the Illinois Healing Arts Malpractice statute, including an affidavit and certificate of merit.
4. The complaint failed to state a claim for relief and was dismissed without prejudice, with a final opportunity to amend.

KEY QUOTATIONS

“HIPAA does not provide a private right of action.” (Analysis)

“Plaintiff’s Complaint is *DISMISSED WITHOUT PREJUDICE* for failure to state a claim for relief under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A.” (Order)

FACTUAL BACKGROUND

Smith, who was detained at the Packard Mental Health Center and had a history of paranoid schizophrenia that he stated was in remission, sued facility staff, the Illinois Department of Human Services, and the Department of Mental Health Services. He alleged medical malpractice and medical neglect, claimed that staff violated HIPAA by communicating with people who contacted the facility and claimed to be his wife or friends, and asserted that those individuals harassed him electronically. He also alleged that police departments should be investigated for illegally arresting and detaining him in the Fulton County Jail.

PROCEDURAL HISTORY

Smith filed a pro se § 1983 complaint alleging medical malpractice, medical neglect, HIPAA violations, and related misconduct by staff members and state agencies. The court screened the complaint under 28 U.S.C. § 1915A and dismissed it without prejudice for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6), granting a final opportunity to amend within 30 days.

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)
- Haywood v. Novartis Pharmaceuticals Corp., 298 F. Supp. 3d 1180, 1191 (N.D. Ind. 2018)
- Carpenter v. Phillips, 419 F. App'x 658, 659 (7th Cir. 2011)
- Doe v. Board of Trustees of the University of Illinois, 429 F. Supp. 2d 930, 944 (N.D. Ill. 2006)
- Huber v. Anderson, 909 F.3d 201, 208 (7th Cir. 2018)
- Young v. United States, 942 F.3d 349, 351 (7th Cir. 2019)
- Hahn v. Walsh, 762 F.3d 617, 628-33 (7th Cir. 2014)

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