

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

Stephen Willett v. Lincoln Correctional Center, et al.

Willett · No. 3:25-cv-03362-JEH · Decided March 6, 2026

SUMMARY

The court conducted a merit review under 28 U.S.C. § 1915A of Stephen Willett’s amended § 1983 complaint concerning injuries allegedly caused by a malfunctioning trash compactor at Lincoln Correctional Center. The court allowed an Eighth Amendment conditions-of-confinement claim to proceed against Maintenance Supervisor Ronnie Boggs, dismissed Lincoln Correctional Center with prejudice, and dismissed the remaining defendants without prejudice. The order also addressed service, pleading, discovery, and medical-record procedures.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	March 6, 2026
DOCKET	3:25-cv-03362-JEH
DISPOSITION	other
PROCEDURAL POSTURE	Merit review of a pro se prisoner's amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	At § 1915A merit review, the court accepted factual allegations as true and liberally construed them in the plaintiff's favor, while disregarding conclusory statements and labels. The pleading had to contain sufficient factual matter to state a claim for relief that was plausible on its face.
PRECEDENTIAL VALUE	unpublished
PARTIES	Stephen Willett v. Lincoln Correctional Center, Lieutenant Kennedy, Tiona Farrington, Ronnie Boggs, Lincoln Correctional Trash Company

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

pleadings

service of process

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged an Eighth Amendment conditions-of-confinement claim against Maintenance Supervisor Ronnie Boggs.
2. Whether Lincoln Correctional Trash Company was a proper defendant under 42 U.S.C. § 1983.
3. Whether Lincoln Correctional Center was a person subject to suit under § 1983 and whether Eleventh Amendment immunity barred a damages action against it.
4. Whether the claims against Warden Tiona Farrington and Lieutenant Kennedy failed because the amended complaint alleged no personal participation and § 1983 does not impose respondeat superior liability.

HOLDINGS

1. The allegations were sufficient to proceed against Boggs on an Eighth Amendment conditions-of-confinement claim because Willett alleged that Boggs knew of the trash compactor's excessive hydraulic-oil leak and nevertheless instructed him to continue using it.
2. Lincoln Correctional Trash Company was not a proper § 1983 defendant on the allegations presented and was dismissed without prejudice.
3. Lincoln Correctional Center was not a person amenable to suit under § 1983 and, as a state agency, was protected by Eleventh Amendment immunity from a suit for money damages; it was dismissed with prejudice.
4. The claims against Farrington and Kennedy failed because the amended complaint contained no specific allegations against them and § 1983 does not impose liability based solely on supervisory status; they were dismissed without prejudice.

KEY QUOTATIONS

“Enough facts must be provided to “state a claim for relief that is plausible on its face.”” (Section I)

“A defendant cannot be sued under § 1983 unless it was acting under color of state law.” (Section III)

“Section 1983 creates a cause of action based on personal liability and predicated upon fault; thus, liability does not attach unless the individual defendant caused or participated in a constitutional deprivation.”
(Section III)

FACTUAL BACKGROUND

While incarcerated at Lincoln Correctional Center on April 25, 2025, Willett was working on the Outside Perimeter Detail and was using a trash compactor that allegedly had a substantial hydraulic-oil leak and other

malfunctions. When he raised a dumpster, the dumpster struck his left pinky, a broken chain caused the hitch to fall onto his right hand, the hitch grazed his right knee, and it landed on and broke his left foot. Willett alleged that he had previously notified Maintenance Supervisor Ronnie Boggs of the leak but was instructed to add five gallons of hydraulic oil daily and continue using the compactor. He received medical treatment but, after being transferred, still had metal lodged in his hand and had not seen a hand surgeon.

PROCEDURAL HISTORY

Willett filed an amended complaint under 42 U.S.C. § 1983 alleging constitutional violations arising from injuries sustained while using a malfunctioning trash compactor at Lincoln Correctional Center. On merit review, the court allowed an Eighth Amendment conditions-of-confinement claim to proceed against Maintenance Supervisor Ronnie Boggs, dismissed Lincoln Correctional Center with prejudice, and dismissed Lieutenant Kennedy, Warden Tiona Farrington, and Lincoln Correctional Trash Company without prejudice. The case proceeded to service against Boggs.

DISPOSITION

other

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649-51 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Wilson v. Ryker, 451 F. App'x 588, 589 (7th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 667, 678 (2009)
- Townsend v. Fuchs, 522 F.3d 765, 773 (7th Cir. 2008)
- Farmer v. Brennan, 511 U.S. 825, 834 (1994)
- Arnett v. Webster, 658 F.3d 742, 750 (7th Cir. 2011)
- Petties v. Carter, 836 F.3d 722, 728 (7th Cir. 2016)
- Birkley v. W. Milwaukee Police Dep't, No. 22-CV-1313-PP, 2023 WL 7130035, at *3 (E.D. Wis. Oct. 30, 2023)
- Collins v. Tchaptchet, No. 2:22-CV-341-JTM-JEM, 2024 WL 983737, at *2 (N.D. Ind. Mar. 6, 2024)
- Rodriguez v. Plymouth Ambulance Serv., 577 F.3d 816, 827 (7th Cir. 2009)
- Will v. Mich. Dep't of State Police, 491 U.S. 58, 71 (1989)
- Wynn v. Southward, 251 F.3d 588, 592 (7th Cir. 2001)
- John Doe v. Purdue University, Doe v. Purdue Univ., 928 F.3d 652, 664 (7th Cir. 2019)
- Vance v. Peters, 97 F.3d 987, 991 (7th Cir. 1996)
- Vance v. Rumsfeld, 701 F.3d 193, 203-05 (7th Cir. 2012) (en banc)
- Sanville v. McCaughtry, 266 F.3d 724, 740 (7th Cir. 2001)

