

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

Willie M. Williams v. Latoya Hughes, et al.

No. 25-1449 (C.D. Ill. Apr. 9, 2026) · No. 25-1449 · Decided April 9, 2026

SUMMARY

The court granted the incarcerated plaintiff leave to proceed in forma pauperis but dismissed his 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A for failure to state a claim. The court found that the allegations concerning medical treatment, prison water, and dental care did not establish deliberate indifference or personal involvement by the named defendants, and granted leave to amend within 30 days. The order also addressed the plaintiff’s motions for status.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	April 9, 2026
DOCKET	25-1449
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se incarcerated plaintiff brought an action under 42 U.S.C. § 1983. The district court considered his petition to proceed in forma pauperis and screened the complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915A, the court accepted factual allegations as true and construed them liberally in the plaintiff's favor, but dismissed claims that were frivolous, malicious, failed to state a claim, or sought relief from an immune defendant. A complaint must contain sufficient factual matter to state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Willie M. Williams v. Latoya Hughes, Nurse, Rambo, Alford, Madole

TOPICS

prisoners rights

section 1983

motions to dismiss

civil procedure

civil rights

PRACTICE AREAS

civil procedure

civil rights

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QUESTIONS PRESENTED

1. Whether Williams qualified to proceed in forma pauperis despite a prior finding that he had three strikes under 28 U.S.C. § 1915(g).
2. Whether the complaint stated an Eighth Amendment deliberate-indifference claim based on the alleged medical treatment and delay in treatment.
3. Whether the complaint adequately alleged personal involvement by Hughes, Nurse, Rambo, Alford, and Madole.
4. Whether the unrelated dental-care allegations could be joined with the medical-care claims in the same action.

HOLDINGS

1. The court granted Williams leave to proceed in forma pauperis because the available record did not provide sufficient information for the court to independently determine that three prior dismissals qualified as strikes under 28 U.S.C. § 1915(g).
2. The complaint failed to state a claim for deliberate indifference to serious medical needs because the allegations showed disagreement with or insufficiency of treatment, but did not plausibly establish that the named defendants knowingly disregarded an excessive risk to Williams's health.
3. The complaint failed to state claims against Hughes, Nurse, and Madole because it did not allege their personal involvement in the asserted denial or delay of medical care, and § 1983 does not impose respondeat superior liability.
4. The dental-care allegations were unrelated to the medical-treatment allegations and could not be pursued in the same lawsuit.

KEY QUOTATIONS

“A prison official acts with deliberate indifference when “the official knows of and disregards an excessive risk to inmate health or safety; the official must both be aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference.””

“Plaintiff's complaint is dismissed for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6) and 28 U.S.C. § 1915A.”

FACTUAL BACKGROUND

Williams, incarcerated at Pontiac Correctional Center, alleged that unidentified correctional officers delayed medical treatment for severe pain, cramping, and blood in his urine, which he attributed to contaminated prison water. He was later diagnosed with bladder cancer and hospitalized, but alleged that physician Alford offered a

digital rectal examination, refused an ice permit, required him to pay for bottled water, and failed to conduct follow-up examinations. He also alleged inadequate dental care, but did not connect that treatment to the defendants involved in his medical-care allegations.

PROCEDURAL HISTORY

The plaintiff filed a § 1983 complaint alleging inadequate medical and dental care while incarcerated at Pontiac Correctional Center, along with a petition to proceed in forma pauperis and motions seeking case status. The court granted the in forma pauperis petition, dismissed the complaint for failure to state a claim under Rule 12(b)(6) and § 1915A, granted leave to amend within 30 days, and addressed the pending status motions in its order.

DISPOSITION

dismissed

CASES CITED

- Sanders v. Melvin, 873 F.3d 957, 959 (7th Cir. 2017)
- Dixon v. Page, 291 F.3d 485, 488 (7th Cir. 2002)
- Isby v. Brown, 856 F.3d 508, 520 (7th Cir. 2017)
- Williams v. Capps, No. 15-cv-708-JPG, ECF No. 5 (S.D. Ill. July 23, 2015)
- Hill v. Madison County, Illinois, 983 F.3d 904, 906 (7th Cir. 2020)
- Estelle v. Gamble, 429 U.S. 97, 104-05 (1976)
- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Petties v. Carter, 836 F.3d 722, 729-30 (7th Cir. 2016) (en banc)
- McDonald v. Hardy, 821 F.3d 882, 888 (7th Cir. 2016)
- Farmer v. Brennan, 511 U.S. 825, 837, 842 (1994)
- Sain v. Wood, 512 F.3d 886, 894-95 (7th Cir. 2008)
- Arnett v. Webster, 658 F.3d 742, 754 (7th Cir. 2011)
- Snipes v. DeTella, 95 F.3d 586, 592 (7th Cir. 1996)
- Ashcroft v. Iqbal, 556 U.S. 662, 676 (2009)
- Vance v. Peters, 97 F.3d 987, 991 (7th Cir. 1996)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Owens v. Godinez, 860 F.3d 434, 436 (7th Cir. 2017)

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