

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

Walter Bradford v. Lisa Y. Wilson

No. 1:26-cv-01244-JEH-RLH (C.D. Ill. June 15, 2026) · No. 1:26-cv-01244-JEH-RLH · Decided June 15, 2026

SUMMARY

The United States District Court for the Central District of Illinois dismissed with prejudice Walter Bradford’s 42 U.S.C. §§ 1983 and 1988 complaint against Illinois state Judge Lisa Y. Wilson arising from child-support proceedings. The court held that judicial immunity barred damages and that § 1983 restricted injunctive relief, and it abstained from exercising jurisdiction over claims implicating ongoing state domestic-relations proceedings.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	June 15, 2026
DOCKET	1:26-cv-01244-JEH-RLH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought an action under 42 U.S.C. §§ 1983 and 1988 seeking damages, declaratory relief, and injunctive relief against a state-court judge arising from child-support proceedings. The federal district court screened the complaint and dismissed it with prejudice.
STANDARD OF REVIEW	De novo screening under 28 U.S.C. § 1915(e)(2), including dismissal of frivolous claims, claims failing to state a claim, and claims seeking monetary relief from an immune defendant.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Walter Bradford v. Judge Lisa Y. Wilson, in her individual and official capacities

TOPICS

subject matter jurisdiction

injunctions

section 1983

child support

civil procedure

PRACTICE AREAS

civil procedure

constitutional law

civil rights

family law

QUESTIONS PRESENTED

1. Whether Bradford could recover damages under 42 U.S.C. § 1983 from Judge Wilson for actions taken in her judicial capacity.
2. Whether Bradford could obtain injunctive relief against Judge Wilson under 42 U.S.C. § 1983 without alleging that a declaratory decree was violated or that declaratory relief was unavailable.
3. Whether the federal court was required to abstain from exercising jurisdiction over claims arising from ongoing state domestic-relations proceedings.
4. Whether Bradford should be permitted to amend his complaint.

HOLDINGS

1. Judicial immunity barred Bradford's damages claims against Judge Wilson because the complained-of conduct consisted of acts performed in her judicial capacity, and the complaint did not establish that she acted in the clear absence of jurisdiction.
2. Bradford could not pursue injunctive relief against Judge Wilson because he did not allege that a declaratory decree was violated or that declaratory relief was unavailable, as required by 42 U.S.C. § 1983.
3. The court abstained from exercising jurisdiction over Bradford's claims because they sought federal intervention in an ongoing state domestic-relations proceeding and were based on the same alleged facts underlying the state-court dispute.
4. Leave to amend was properly denied because amendment would be futile in light of Judge Wilson's absolute immunity and the court's obligation to abstain from exercising jurisdiction.

KEY QUOTATIONS

“Judicial immunity “confers complete immunity from suit, not just a mere defense to liability[.]””

“The Court will thus abstain from exercising jurisdiction over the Plaintiff’s Complaint.”

FACTUAL BACKGROUND

Bradford was involved in ongoing child-support proceedings in Peoria County, Illinois, before Judge Lisa Y. Wilson. He alleged that Judge Wilson asserted jurisdiction, failed to adequately address his objections and constitutional arguments, and held him in contempt on multiple occasions, resulting in incarceration, loss of liberty and income, employment disruption, emotional and financial distress, and harm to family relationships. He also alleged that Judge Wilson previously presided over proceedings involving his minor son and denied him an opportunity to assist his son.

PROCEDURAL HISTORY

Bradford filed his federal complaint on June 8, 2026. The court screened the complaint, concluded that judicial immunity barred damages claims, Section 1983 barred the requested injunctive relief because neither statutory exception was alleged, and abstention was required because the claims implicated ongoing state domestic-relations proceedings. The court denied leave to amend as futile, dismissed the complaint with prejudice, directed entry of judgment, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Rowe v. Shake, 196 F.3d 778, 783 (7th Cir. 1999)
- Hoskins v. Poelstra, 320 F.3d 761, 763 (7th Cir. 2003)
- Dawson v. Newman, 419 F.3d 656, 660-61 (7th Cir. 2005)
- Brokaw v. Mercer County, 235 F.3d 1000, 1015 (7th Cir. 2000)
- Stump v. Sparkman, 435 U.S. 349, 356-57, 359, 362 (1978)
- Syph v. Arce, 772 F. App'x 356, 357 (7th Cir. 2019)
- Lloyd v. Loeffler, 694 F.2d 489, 492 (7th Cir. 1982)
- Savelskas v. Tribble, No. 25 C 3000, 2026 WL 509215, at *1 (N.D. Ill. Feb. 24, 2026)
- Reardon v. Danley, 74 F.4th 825, 827 (7th Cir. 2023)
- J.B. v. Woodward, 997 F.3d 714, 721 (7th Cir. 2021)
- Parungao v. Community Health Systems, Inc., 858 F.3d 452, 457 (7th Cir. 2017)
- Florance v. Barnett, No. 23-1453, 2023 WL 7017085, at *3 (7th Cir. Oct. 25, 2023)
- Barry Aviation Inc. v. Land O'Lakes Municipal Airport Commission, 377 F.3d 682, 687 (7th Cir. 2004)