

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, ROCK ISLAND DIVISION

Anthony Sullivan v. Gerald Carreon, et al.

Sullivan v. Carreon · No. 4:23-cv-4059 · Decided March 26, 2026

SUMMARY

The court grants Defendants’ motion to supplement and motion for summary judgment in Anthony Sullivan’s 42 U.S.C. § 1983 action concerning mental health treatment provided at an Illinois sexually violent persons detention facility. Applying the Fourteenth Amendment’s objective-reasonableness standard and deference to professional treatment decisions, the court concludes that no reasonable juror could find that Defendants’ treatment decisions were constitutionally unreasonable. The case is terminated, and judgment is directed in favor of Defendants.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Rock Island Division
WRITING FOR THE COURT	Ronald L. Hanna
JURISDICTION	United States District Court for the Central District of Illinois, Rock Island Division
DECIDED	March 26, 2026
DOCKET	4:23-cv-4059
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging that treatment provided during his civil detention violated the Fourteenth Amendment. Defendants moved for summary judgment and to supplement their summary-judgment motion with additional exhibits and facts.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. Facts and reasonable inferences are construed in favor of the nonmoving party. The constitutional adequacy of treatment for a civil detainee is reviewed under an objective-reasonableness standard, with deference to treatment decisions by qualified professionals unless they substantially depart from accepted professional judgment, practice, or standards.

PRECEDENTIAL VALUE	unknown
PARTIES	Anthony Sullivan v. Gerald Carreon, Schupick, Bygrave, other named defendants

TOPICS

summary judgment section 1983 fourteenth amendment due process civil rights

PRACTICE AREAS

civil rights constitutional law prisoner and civil detainee litigation summary judgment

QUESTIONS PRESENTED

1. Whether defendants violated Sullivan's Fourteenth Amendment rights by requiring him to revisit disputed sexual-history disclosures during treatment-group sessions.
2. Whether the referral of Sullivan to the Power to Change group and the treatment team's acceptance of that referral constituted objectively unreasonable treatment.
3. Whether providing the Power to Change group for one hour per week was constitutionally inadequate.
4. Whether defendants were entitled to summary judgment because no reasonable juror could find that their treatment decisions violated Sullivan's constitutional rights.

HOLDINGS

1. A civil detainee claiming inadequate mental-health treatment must show that the official's conduct was objectively unreasonable and that the official acted purposefully, knowingly, or perhaps recklessly; negligence or gross negligence is insufficient.
2. Treatment decisions by qualified professionals are presumptively valid and receive deference unless the evidence shows a substantial departure from accepted professional judgment, practice, or standards.
3. A detainee's disagreement with treatment methods, without evidence of objectively unreasonable conduct or a substantial departure from professional judgment, does not establish constitutional liability.
4. The fact that a treatment program provides fewer treatment hours than another program does not, without more, establish that the program is constitutionally inadequate.
5. Defendants were entitled to summary judgment because the record did not permit a reasonable inference that their actions were objectively unreasonable or that they violated Sullivan's constitutional rights.

KEY QUOTATIONS

“The record does not permit a reasonable inference that Defendants’ actions were objectively unreasonable. The Court finds that no reasonable juror could conclude that Defendants violated Plaintiff’s constitutional rights.”

FACTUAL BACKGROUND

Sullivan was civilly detained at the Rushville Treatment and Detention Facility under the Illinois Sexually Violent Persons Commitment Act and voluntarily participated in a phased mental-health treatment program. After a 2019 polygraph examination raised questions about his disclosure of sexual-history information, defendants Schupick and Bygrave required him to revisit those issues during disclosure-group sessions in 2022. Sullivan characterized the treatment as interrogative and shame-based and challenged his referral to the Power to Change group and the limited frequency of that group's sessions. An independent evaluator nevertheless recommended that Sullivan no longer be classified as a sexually violent person and should be discharged from treatment.

PROCEDURAL HISTORY

Sullivan, proceeding pro se and detained under the Illinois Sexually Violent Persons Commitment Act, sued facility treatment personnel under § 1983. The court granted defendants' unopposed motion to supplement, then granted defendants' motion for summary judgment, directed entry of judgment for defendants, denied remaining motions as moot, and terminated the case.

DISPOSITION

other

CASES CITED

- Mackel v. Jumper, 2024 WL 3250356, at *1 (7th Cir. 2024)
- Lehn v. Scott, No. 4:15-cv-4142, ECF No. 64 at 4-5 (C.D. Ill. Aug. 20, 2020)
- Pegues v. Liberty Healthcare Corp., 2022 WL 4553190, at *1 (C.D. Ill. Sept. 14, 2022)
- Ogden v. Atterholt, 606 F.3d 355, 358 (7th Cir. 2010)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323 (1986)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Allison v. Snyder, 332 F.3d 1076, 1079-81 (7th Cir. 2003)
- Miranda v. County of Lake, 900 F.3d 335, 352-53 (7th Cir. 2018)
- McCann v. Ogle County, Illinois, 909 F.3d 881, 888 (7th Cir. 2018)
- Johnson v. Rimmer, 936 F.3d 695, 707 (7th Cir. 2019)
- Youngberg v. Romeo, 457 U.S. 307, 323 (1982)
- Holloway v. Delaware County Sheriff, 700 F.3d 1063, 1074 (7th Cir. 2012)
- McKune v. Lile, 536 U.S. 24, 33 (2002)
- Arnett v. Webster, 658 F.3d 742, 754 (7th Cir. 2011)
- Snipes v. DeTella, 95 F.3d 586, 592 (7th Cir. 1996)
- Powers v. Block, 750 F. App'x 480, 484-85 (7th Cir. 2018)
- Celske v. Edwards, 164 F.3d 396, 398 (7th Cir. 1999)
- Walker v. O'Brien, 216 F.3d 626, 632 (7th Cir. 2000)

