

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Londale Madison v. Anthony Wills, et al.

Madison v. Wills · No. 3:25-cv-01628-SPM · Decided January 6, 2026

SUMMARY

The United States District Court for the Southern District of Illinois conducts preliminary review under 28 U.S.C. § 1915A of Londale Madison’s § 1983 complaint concerning alleged failure to protect him from sexual assault by a cellmate. The court dismisses claims concerning confiscated documents and Fourth and Fourteenth Amendment theories, while allowing an Eighth Amendment failure-to-protect claim to proceed against the named correctional officials. The court also addresses service, identification of John Doe defendants, protective-order procedures, and motions filed by the plaintiff’s jailhouse lawyer.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Stephen P. McGlynn
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	January 6, 2026
DOCKET	3:25-cv-01628-SPM
DISPOSITION	other
PROCEDURAL POSTURE	The court conducted preliminary review of a prisoner civil-rights complaint under 28 U.S.C. § 1915A and allowed an Eighth Amendment failure-to-protect claim to proceed against the named defendants, while dismissing other allegations and claims.
STANDARD OF REVIEW	Preliminary screening under 28 U.S.C. § 1915A; the complaint is dismissed in whole or in part if it is frivolous, malicious, fails to state a claim, or seeks damages from an immune defendant. The court applied the plausibility standard under Bell Atlantic Corp. v. Twombly and Ashcroft v. Iqbal.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; generally nonprecedential.

PARTIES

Londale Madison v. Anthony Wills, Kevin Reichert, Ms. Klausie, C/O Tyner, C/O Knight, C/O John Doe 1, John Doe 2

TOPICS

section 1983 prisoners rights civil rights cruel and unusual punishment civil procedure

PRACTICE AREAS

civil rights prisoner litigation constitutional law civil procedure

QUESTIONS PRESENTED

1. Whether Madison plausibly stated an Eighth Amendment failure-to-protect claim against the prison officials and officers.
2. Whether the complaint plausibly stated a claim against Warden Wills based on an alleged prison policy or practice.
3. Whether the alleged confiscation of litigation documents stated a claim against the named defendants.
4. Whether the alleged failure to protect should be analyzed under the Fourth or Fourteenth Amendments rather than the Eighth Amendment.
5. Whether Madison's motions concerning confiscated exhibits and assistance or representation by a jailhouse lawyer should be granted.

HOLDINGS

1. The complaint plausibly alleged that Madison faced a substantial risk of serious harm, that the defendants had actual knowledge of the risk, and that they failed to act; Count 1 therefore proceeds against Wills, Reichert, Klausie, Tyner, Knight, John Doe 1, and John Doe 2.
2. The failure-to-protect claim is analyzed under the Eighth Amendment, and Madison's claims under the Fourth and Fourteenth Amendments were dismissed.
3. The complaint did not plausibly state a separate claim against Wills based on an allegedly pre-approved prison-wide policy or practice because it alleged only Madison's personal experience and conclusory assertions.
4. Any claim based on the confiscation of Madison's original complaint, exhibits, letters, or grievances was dismissed because the alleged conduct was not attributed to any named defendant.
5. A non-lawyer jailhouse lawyer may not represent another person in federal court, assert another inmate's rights, or file or sign papers on another inmate's behalf.

KEY QUOTATIONS

“To state a claim for failure to protect, a plaintiff must first demonstrate, objectively, that he is “incarcerated under conditions posing a substantial risk of serious harm.””

“Instead, a plaintiff “must allege a tangible threat to his safety or well-being” and “a substantial risk of future harm.””

FACTUAL BACKGROUND

Madison alleged that he was housed with a cellmate who threatened and sexually assaulted him, despite his repeated requests to prison personnel for a cell transfer and protection. He alleged that Wills, Reichert, Klausie, Tyner, Knight, and two John Doe officers failed to respond adequately before and after the assaults, until an attack resulted in both inmates being maced and placed in segregation. He also alleged that prison security staff followed a policy or practice of ignoring requests for protection until violence occurred.

PROCEDURAL HISTORY

Madison, an Illinois prisoner, filed a pro se action under 42 U.S.C. § 1983 concerning alleged sexual assaults by a cellmate and prison officials' failure to protect him. The court reviewed the complaint before service under § 1915A, dismissed the claim concerning confiscated litigation documents and claims under the Fourth and Fourteenth Amendments, denied several pending motions, and ordered service and identification procedures for the remaining claim.

DISPOSITION

other

CASES CITED

- Farmer v. Brennan, 511 U.S. 825, 834 (1994)
- Wilson v. Ryker, 451 F. App'x 588, 589 (7th Cir. 2011)
- County of Sacramento v. Lewis, 523 U.S. 833, 842 (1998)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Sinn v. Lemmon, 911 F.3d 412, 423 (7th Cir. 2018)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Devose v. Herrington, 42 F.3d 470, 471 (8th Cir. 1994)
- Daniels v. Dumsdorff, No. 19-cv-00394-NJR, 2019 WL 3322344, at *1 (S.D. Ill. July 24, 2019)
- Johnson v. Bank One N.A., 90 F. App'x 956, 957 (7th Cir. 2004)
- Kalinowski v. Ill. Cent. Mgmt., No. 08-cv-14-MJR, 2008 WL 2001966, at *1 (S.D. Ill. May 7, 2008)