

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

Jereme Maxwell v. John Does et al.

Maxwell · No. 25-4115 · Decided March 19, 2026

SUMMARY

The court screened Jereme Maxwell’s § 1983 complaint concerning disciplinary restrictions and an allegedly false investigative report arising from events at an Illinois treatment and detention facility. The court dismissed the complaint for failure to state a claim and untimeliness, granted leave to amend within thirty days, granted in forma pauperis status, denied appointed counsel, and found the remaining motions moot.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Rock Island Division
WRITING FOR THE COURT	Colleen R. Lawless
JURISDICTION	United States District Court for the Central District of Illinois, Rock Island Division
DECIDED	March 19, 2026
DOCKET	25-4115
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a pro se civil-rights complaint filed by a civil detainee proceeding in forma pauperis under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	On § 1915A screening, the court accepts well-pleaded factual allegations as true and liberally construes them in the plaintiff’s favor, but conclusory statements and labels are insufficient; the complaint must state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jereme Maxwell v. John Does et al.

TOPICS

- section 1983
- due process
- statute of limitations
- motions to dismiss
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

civil procedure

prisoner and civil detainee litigation

remedies

QUESTIONS PRESENTED

1. Whether the complaint stated a claim under 42 U.S.C. § 1983 against an official who allegedly authored an unsigned and incomplete investigative report.
2. Whether the complaint stated a § 1983 claim against an official whom the complaint did not connect to any act or omission causing a constitutional deprivation.
3. Whether the restrictions imposed after Maxwell's battery finding constituted an atypical and significant hardship triggering Fourteenth Amendment procedural due process protections.
4. Whether the due-process claim was barred by Illinois's two-year statute of limitations.
5. Whether Maxwell was entitled to appointed counsel in this civil case.

HOLDINGS

1. An unsigned, incomplete draft investigative report, without allegations establishing a breached duty and actual damages, does not state a claim under 42 U.S.C. § 1983.
2. A defendant cannot be liable under § 1983 without personal responsibility for the alleged deprivation of the plaintiff's constitutional rights.
3. Restrictions imposed after a detainee was found to have committed a major rule violation do not trigger procedural due process protections unless they impose an atypical and significant hardship in relation to the ordinary incidents of confinement.
4. The complaint's due-process claim was untimely because it was filed more than two years after Maxwell knew of the restrictions and their alleged injury.
5. An indigent civil litigant is not entitled to appointed counsel merely by filing a request; the plaintiff must first show a reasonable attempt to obtain counsel or effective preclusion from doing so.

KEY QUOTATIONS

“state-created liberty interests—which is to say, due process protections—“will be generally limited to freedom from restraint which, ... imposes atypical and significant hardships on the inmate in relation to the ordinary incidents of prison life.””

“Unrelated claims against different defendants belong in different suits.”

FACTUAL BACKGROUND

Maxwell, a resident of the Illinois Department of Human Services Treatment and Detention Facility, alleged that an investigator prepared an unsigned and incomplete report concerning a 2021 physical altercation and that a Behavioral Committee later found him responsible for battery. He alleged that the committee proceedings occurred without prior notice and resulted in restrictions on job opportunities, recreation, treatment-team participation, and transportation restraints. The court took judicial notice of a related case in which Maxwell

admitted assaulting facility staff and in which summary judgment had been entered against his excessive-force and medical-care claims.

PROCEDURAL HISTORY

Maxwell filed a § 1983 complaint against TDF officials and John and Jane Does, together with a petition to proceed in forma pauperis and motions for counsel, an extension of time, and status. The court granted IFP status, denied the motion for counsel, found the complaint failed to state a federal claim, and dismissed it under 28 U.S.C. § 1915A(b)(1). The court granted leave to file an amended complaint within thirty days and otherwise indicated the case would be dismissed without prejudice.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

No remand. Maxwell was granted leave to file an amended complaint within thirty days. Any amended complaint must be attached to a motion for leave, stand independently, include all claims and defendants, identify the constitutional violation, its date, and the personally involved defendants, and avoid joining unrelated claims against different defendants.

CASES CITED

- Brewster v. North Am. Van Lines, Inc., 461 F.2d 649, 651 (7th Cir. 1972)
- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- White v. Keely, 814 F.3d 883, 886 (7th Cir. 2016)
- Garza v. Henderson, 779 F.2d 390, 395 (7th Cir. 1985)
- Mitchell v. Kallas, 895 F.3d 492, 498 (7th Cir. 2018)
- Sandin v. Conner, 515 U.S. 472, 483 (1995)
- Lekas v. Briley, 405 F.3d 602, 608 (7th Cir. 2005)
- Miller v. Dobier, 634 F.3d 412, 414-15 (7th Cir. 2011)
- Levi v. Thomas, 429 F. App'x 611, 612 (7th Cir. 2011)
- Khan v. United States, 808 F.3d 1169, 1172 (7th Cir. 2015)
- Liberty v. City of Chicago, 860 F.3d 1017, 1019 (7th Cir. 2017)
- Arteaga v. United States, 711 F.3d 828, 831 (7th Cir. 2013)
- Lewis v. City of Chicago, 914 F.3d 472, 478 (7th Cir. 2019)
- Tobey v. Chibucos, 890 F.3d 634, 645 (7th Cir. 2018)
- Gentry v. Duckworth, 65 F.3d 555, 561 (7th Cir. 1995)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)

