

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Jeffrey L. Smith v. John/Jane Does, et al.

Case No. 25-3324 (C.D. Ill. Mar. 17, 2026) · No. 25-3324 · Decided March 17, 2026

SUMMARY

The United States District Court for the Central District of Illinois dismisses Jeffrey L. Smith’s amended 42 U.S.C. § 1983 complaint after screening under 28 U.S.C. § 1915A. The court concludes that HIPAA provides no private right of action and that the remaining allegations are vague and fail to establish defendants’ personal involvement in a constitutional violation; the dismissal is with prejudice and counts as a strike under § 1915(g).

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois
DECIDED	March 17, 2026
DOCKET	25-3324
DISPOSITION	dismissed
PROCEDURAL POSTURE	Merit-review screening of a pro se detainee's amended complaint under 28 U.S.C. § 1915A, resulting in dismissal with prejudice under Federal Rule of Civil Procedure 12(b)(6).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court accepted factual allegations as true and liberally construed them in the plaintiff's favor, but required sufficient nonconclusory facts to state a plausible claim for relief. The court dismissed claims that were legally insufficient, including claims that failed to state a claim upon which relief could be granted.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jeffrey L. Smith v. John/Jane Does, et al.

TOPICS

- section 1983
- motions to dismiss
- prisoners rights
- hipaa
- civil procedure

PRACTICE AREAS

civil rights

civil procedure

prisoner litigation

health law

QUESTIONS PRESENTED

1. Whether the amended complaint stated a claim under 42 U.S.C. § 1983 based on alleged communications concerning Smith's mental health.
2. Whether the amended complaint stated a constitutional claim based on the alleged transfer to the Fulton County Sheriff's Detention Facility, inadequate medical care, or disclosure of attorney-client communications.
3. Whether amendment should be permitted when the court determined that further amendment would be futile.

HOLDINGS

1. HIPAA does not provide a private right of action, so Smith could not maintain a private claim based solely on alleged disclosures or communications concerning his mental health.
2. The amended complaint failed to state a § 1983 claim because its allegations were vague and confusing and did not demonstrate each defendant's direct, personal involvement in a constitutional violation.
3. Leave to amend was properly denied because any further amendment to the claims raised in the pleading would be futile.

KEY QUOTATIONS

"HIPAA does not provide a private right of action."

"Liability under § 1983 requires a defendant's direct, personal involvement."

"Plaintiff's Amended Complaint is DISMISSED WITH PREJUDICE under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A for failure to state a federal claim upon which relief may be granted."

FACTUAL BACKGROUND

Smith, who was detained at Packard Mental Health Center, alleged that defendants communicated with facility staff about his mental health. He also alleged that defendants took him to the Fulton County Sheriff's Detention Facility, that two defendants failed to provide proper medical care there, and that a nonparty disclosed attorney-client communications. The court found the allegations vague and confusing and insufficient to show defendants' personal involvement in a constitutional violation.

PROCEDURAL HISTORY

Smith filed an amended complaint under 42 U.S.C. § 1983 alleging constitutional violations arising from communications about his mental health, an alleged transfer or kidnapping, inadequate medical care, and disclosure of attorney-client communications. The court screened the amended complaint, concluded that the HIPAA-related claim was not actionable and that the remaining allegations failed to establish personal involvement or a plausible constitutional violation, and dismissed the action with prejudice. The court also

assessed a strike under 28 U.S.C. § 1915(g), directed continued collection of the filing fee, and ordered the clerk to enter judgment and close the case.

DISPOSITION

dismissed

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Haywood v. Novartis Pharms. Corp., 298 F. Supp. 3d 1180, 1191 (N.D. Ind. 2018)
- Carpenter v. Phillips, 419 F. App'x 658, 659 (7th Cir. 2011)
- Doe v. Board of Trs. of the Univ. of Ill., 429 F. Supp. 2d 930, 944 (N.D. Ill. 2006)
- Gentry v. Duckworth, 65 F.3d 555, 561 (7th Cir. 1995)
- Vance v. Peters, 97 F.3d 987, 991 (7th Cir. 1996)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Luevano v. Wal-Mart Stores, Inc., 722 F.3d 1014, 1025 (7th Cir. 2013)
- Gonzalez-Koeneke v. West, 791 F.3d 801, 807 (7th Cir. 2015)
- Arreola v. Godinez, 546 F.3d 788, 796 (7th Cir. 2008)
- Celske v. Edwards, 164 F.3d 396, 398 (7th Cir. 1999)
- Walker v. O'Brien, 216 F.3d 626, 632 (7th Cir. 2000)