

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

Michael Hendricks v. Livingston County et al.

Hendricks · No. 1:26-cv-01138-SEM · Decided May 21, 2026

SUMMARY

The United States District Court for the Central District of Illinois screened Michael Hendricks’s complaint concerning alleged denial of personal possession of glucose tablets while detained at the Livingston County Jail. The court dismissed the complaint under 28 U.S.C. § 1915A(b)(1) for failure to state a claim, while granting leave to amend within thirty days, and denied the motion for injunctive relief. The court found insufficient allegations of personal involvement, grievance-related liability, or a policy or custom supporting liability against the corporate medical provider.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Sue E. Myerscough
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	May 21, 2026
DOCKET	1:26-cv-01138-SEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a detainee's amended complaint under 28 U.S.C. § 1915A and consideration of a motion for injunctive relief.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court screens the complaint and dismisses claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. Factual allegations are accepted as true and liberally construed in the plaintiff's favor, but conclusory allegations and labels are insufficient. A complaint must contain enough factual matter to state a plausible claim for relief.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value.

PARTIES

Michael Hendricks v. Livingston County, Ryan Bohm, Lisa Draper, Scott Harmon, Hughes Lochard, Jailayia Frazier, Susanna Legner, Turn Key Medical

TOPICS

section 1983 due process injunctions civil procedure health law

PRACTICE AREAS

civil rights constitutional law prisoner medical care civil procedure injunctive relief

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged that any individual defendant violated Hendricks's Fourteenth Amendment right to objectively reasonable medical care.
2. Whether the allegations against Turn Key Medical supported § 1983 liability based on an official policy, widespread practice or custom, or policymaker action.
3. Whether the alleged failure of jail officials to respond to grievances stated a federal due-process claim.
4. Whether Hendricks was entitled to preliminary or mandatory injunctive relief.

HOLDINGS

1. The complaint failed to state a plausible constitutional claim because it did not identify which defendant denied Hendricks possession of glucose tablets and did not allege facts showing that the named defendants purposefully, knowingly, or recklessly engaged in objectively unreasonable medical care.
2. The alleged failure of Draper and Harmon to respond to Hendricks's grievances did not state a federal due-process violation.
3. The complaint failed to state a § 1983 claim against Turn Key Medical because it did not allege that an official policy, widespread practice or custom, or final policymaker caused the alleged constitutional deprivation.
4. Hendricks was not entitled to injunctive relief because the motion concerned allegations not included in the complaint and, in any event, he had not stated a plausible underlying constitutional claim.

KEY QUOTATIONS

“A claim is legally insufficient if it “(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.”” (Analysis, Part I.A.)

“A plaintiff cannot state a claim against a defendant by including the defendant’s name in the caption.” (Analysis, Part I.C.)

“Unrelated claims against different defendants belong in different suits.” (Analysis, Part I.C.)

“An injunction is an equitable remedy, not a separate cause of action.” (Analysis, Part II.)

FACTUAL BACKGROUND

Hendricks, a pretrial detainee and longtime Type I diabetic, alleged that he experienced low blood glucose on March 7, 15, and 29, 2026, and was denied permission to personally possess glucose tablets. He did not identify who denied that request, and alleged only that physician Hughes Lochard was unaware of any Turn Key policy prohibiting possession of the tablets. He also alleged that jail officials failed to respond to grievances. His motion for injunctive relief instead alleged that he was receiving an improper amount of insulin at an improper time, but that allegation was not included in the dismissed pleading.

PROCEDURAL HISTORY

Michael Hendricks, a detainee at the Livingston County Jail, filed an amended complaint alleging that he was denied personal possession of glucose tablets and that jail officials failed to respond to grievances. He also moved for injunctive relief based on alleged denial of insulin in accordance with a specialist's instructions. The court dismissed the complaint without prejudice for failure to state a federal claim, denied injunctive relief, and granted leave to amend within thirty days.

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)
- Miranda v. County of Lake, 900 F.3d 335 (7th Cir. 2018)
- McCann v. Ogle County, 909 F.3d 881, 886 (7th Cir. 2018)
- Pittman by and through Hamilton v. Madison Cnty., Illinois, 108 F.4th 561, 570 (7th Cir. 2024)
- Bravo v. Midland Credit Mgmt., 812 F.3d 599, 601–02 (7th Cir. 2016)
- Charleston v. Bd. of Trs. of the Univ. of Ill. at Chi., 741 F.3d 769, 772 (7th Cir. 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Collins v. Kibort, 143 F.3d 331, 334 (7th Cir. 1998)
- Owens v. Evans, 878 F.3d 559, 563 (7th Cir. 2017)
- Owens v. Hinsley, 635 F.3d 950, 953 (7th Cir. 2011)
- Olson v. Champaign County, Ill., 784 F.3d 1093, 1104 (7th Cir. 2015)
- Thomas v. Cook Cty. Sheriff's Dept., 604 F.3d 293, 303 (7th Cir. 2010)
- Woodward v. Corr. Med. Servs. of Ill., Inc., 368 F.3d 917, 927–28 (7th Cir. 2004)
- Monell v. N.Y. City Dep't of Soc. Servs., 436 U.S. 658 (1978)
- Gentry v. Duckworth, 65 F.3d 555, 561 (7th Cir. 1995)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)

- American Hospital Ass'n v. Harris, 625 F.2d 1328, 1330 (7th Cir. 1980)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- e360 Insight v. Spamhaus Project, 500 F.3d 594, 604 (7th Cir. 2007)
- Walgreen Co. v. Sara Creek Property Co., B.V., 966 F.2d 273, 275 (7th Cir. 1992)
- Girl Scouts of Manitou Council, Inc. v. Girl Scouts of the United States of Am. Inc., 549 F.3d 1079, 1086 (7th Cir. 2008)
- HH-Indianapolis, LLC v. Consol. City of Indianapolis, 889 F.3d 432, 437 (7th Cir. 2018)
- Graham v. Med. Mut. of Ohio, 130 F.3d 293, 295 (7th Cir. 1997)
- CustomGuide v. CareerBuilder, LLC, 813 F. Supp. 2d 990, 1002 (N.D. Ill. 2011)
- Guardians Ass'n v. Civil Serv. Comm'n, 463 U.S. 582, 595 (1983)
- Davis v. Passman, 442 U.S. 228, 239 (1979)
- Knutson v. Village of Lakemoor, 932 F.3d 572, 576 n.4 (7th Cir. 2019)

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