

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Gerald Jones v. Latoya Hughes, et al.

Jones v. Hughes · No. 25-cv-01317-SMY · Decided March 30, 2026

SUMMARY

The court denied Plaintiff Gerald Jones’s motion to recuse and disqualify the judge, finding that his allegations of bias were unsupported and based primarily on adverse judicial rulings. Because Jones failed to file an amended complaint after his original complaint was stricken for improper joinder, the court dismissed the action without prejudice for failure to comply with a court order. The court also directed payment of the filing fee from Jones’s prison trust account and ordered the case closed.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Staci M. Yandle
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 30, 2026
DOCKET	25-cv-01317-SMY
DISPOSITION	dismissed
PROCEDURAL POSTURE	The prisoner plaintiff moved to recuse and disqualify the presiding judge after the court struck his complaint for improper joinder and granted leave to amend. The court denied recusal and dismissed the action without prejudice when plaintiff failed to file an amended complaint.
STANDARD OF REVIEW	Recusal under 28 U.S.C. § 455 is assessed under the objective reasonable-questioning-impartiality standard and the statute's specified grounds. Dismissal for failure to comply with a court order was entered under Federal Rule of Civil Procedure 41(b).
PRECEDENTIAL VALUE	Unknown; memorandum and order from a federal district court with no reported citation.
PARTIES	Gerald Jones v. Latoya Hughes, et al.

TOPICS

civil procedure

prisoners rights

section 1983

affirmative defenses

PRACTICE AREAS

Civil procedure

Prisoner civil rights

Judicial disqualification

In forma pauperis litigation

QUESTIONS PRESENTED

1. Whether the plaintiff established a statutory or objective basis for recusal or disqualification under 28 U.S.C. § 455.
2. Whether the action should be dismissed without prejudice when the plaintiff failed to file an amended complaint after the court struck the original complaint and granted leave to amend.
3. Whether dismissal counted as a strike under 28 U.S.C. § 1915(g) and whether the plaintiff remained liable for the filing fee.

HOLDINGS

1. The plaintiff failed to establish either that the judge's impartiality might reasonably be questioned or that any of the specific grounds for recusal under 28 U.S.C. § 455(b) applied; the motion to recuse and disqualify was denied.
2. The action was dismissed without prejudice because the plaintiff failed to comply with the court's order granting leave to file an amended complaint, leaving the court without an operative complaint to screen.
3. The dismissal did not count as a strike under 28 U.S.C. § 1915(g), but the plaintiff remained obligated to pay the filing fee incurred when the action was filed, with collection from his prison trust account under 28 U.S.C. § 1915(b)(1).

KEY QUOTATIONS

“judicial rulings alone almost never constitute valid basis for a bias or partiality recusal motion.”

“In the absence of an operative Complaint, the Court cannot conduct the required merits screening under 28 U.S.C. § 1915A and cannot evaluate whether Plaintiff may qualify for IFP status under the provisions of 28 U.S.C. § 1915(g).”

FACTUAL BACKGROUND

Gerald Jones, an IDOC prisoner housed at Menard Correctional Center, filed this action after previously litigating related claims. The court concluded that his complaint improperly joined unrelated claims and defendants, struck the complaint, and allowed him to file an amended complaint. Jones did not file an amended complaint and instead alleged that the presiding judge was biased because of rulings concerning his prior and current cases.

PROCEDURAL HISTORY

Jones filed a prisoner civil-rights action and was subject to the restrictions of 28 U.S.C. § 1915(g). The court struck his original complaint on December 22, 2025, for improper joinder of claims and defendants, and granted

leave to amend by January 21, 2026. Jones did not amend but instead moved for recusal and disqualification. The court denied that motion, dismissed the action without prejudice for failure to comply with a court order, denied pending motions as moot, and directed the Clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Jones v. Jeffreys, Case No. 23-cv-2889-SMY (S.D. Ill. filed Aug. 21, 2023)
- Jones v. Wills, Case No. 23-cv-2804-DWD (S.D. Ill. filed Aug. 15, 2023)
- Liteky v. United States, 510 U.S. 540, 555 (1994)
- Ladien v. Astrachan, 128 F.3d 1051 (7th Cir. 1997)
- Lucien v. Jockisch, 133 F.3d 464, 467 (7th Cir. 1998)
- Ammons v. Gerlinger, 547 F.3d 724, 725-26 (7th Cir. 2008)
- Sloan v. Lesza, 181 F.3d 857, 858-59 (7th Cir. 1999)