

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
ILLINOIS

**Bobby Tatum v. Darren Galloway, John Does, Jane Does, Lt.  
Thomas, John Doe Officers, Jane Doe Nurse, Gregory D. Little, and  
Jacob Fletcher**

Tatum · No. 25-cv-2019-NJR · Decided May 21, 2026

SUMMARY

The United States District Court for the Southern District of Illinois screened Bobby Tatum’s amended 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A. The court dismissed with prejudice the First Amendment retaliation claim concerning Tatum’s transfer to Pinckneyville Correctional Center, finding the allegations insufficient to establish retaliatory motive. The court severed the excessive force, deliberate indifference, retaliation, and due process claims involving events at Pinckneyville into a new case and directed the Clerk to close the original action.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of Illinois                                                                                                                                                                                                                                                                                  |
| WRITING FOR THE COURT | Nancy J. Rosenstengel                                                                                                                                                                                                                                                                                                                               |
| JURISDICTION          | United States District Court for the Southern District of Illinois                                                                                                                                                                                                                                                                                  |
| DECIDED               | May 21, 2026                                                                                                                                                                                                                                                                                                                                        |
| DOCKET                | 25-cv-2019-NJR                                                                                                                                                                                                                                                                                                                                      |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE    | Screening of a prisoner's amended complaint under 28 U.S.C. § 1915A.                                                                                                                                                                                                                                                                                |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915A, the court must dismiss any portion of a prisoner's complaint that is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks damages from an immune defendant. Failure to state a claim is assessed under the plausibility standard articulated in <i>Bell Atlantic Corp. v. Twombly</i> . |
| PRECEDENTIAL VALUE    | unknown                                                                                                                                                                                                                                                                                                                                             |
| PARTIES               | Bobby Tatum v. Darren Galloway, John Does, Jane Does, Lt. Thomas, John Doe Officers, Jane Doe Nurse, Gregory D. Little, Jacob Fletcher                                                                                                                                                                                                              |

## TOPICS

civil procedure   section 1983   first amendment   joinder   due process

## PRACTICE AREAS

civil procedure   constitutional law   civil rights   prisoner litigation   remedies

## QUESTIONS PRESENTED

1. Whether Tatum stated a First Amendment retaliation claim based on his transfer to Pinckneyville Correctional Center after filing a PREA complaint.
2. Whether the claims arising from the alleged excessive force, denial of medical care, false disciplinary ticket, and disciplinary adjudication were improperly joined with the transfer-retaliation claim.
3. Whether the unidentified transfer officials were sufficiently specified to support claims against particular defendants.

## HOLDINGS

1. Tatum failed to state a First Amendment retaliation claim because he did not plausibly allege that his PREA complaint was a motivating factor in the transfer to Pinckneyville.
2. Counts 2 through 5 were improperly joined with Count 1 and were severed into a new case.
3. The claims against the John and Jane Doe transfer officers were inadequately pleaded because Tatum did not identify particular defendants or allege facts connecting any specific official to the retaliatory transfer.

## KEY QUOTATIONS

*“But in order to state a retaliation claim, an inmate must allege that the protected conduct was at least a motivating factor for the detriment—in this case, the transfer to Pinckneyville.”* (Discussion, Count 1)

*“Federal Rule of Civil Procedure 20 prohibits a plaintiff from asserting unrelated claims against different defendants or sets of defendants in the same lawsuit.”* (Discussion, Severance of Counts 2-5)

## FACTUAL BACKGROUND

Tatum alleged that after reporting a 2023 rape to a mental-health provider on February 6, 2025, he was transferred from Shawnee Correctional Center to Pinckneyville Correctional Center six days later. He claimed the transfer was retaliatory, but alleged no facts showing that Warden Galloway or the unidentified transfer officers knew of the complaint or were motivated by it. He separately alleged that Lieutenant Thomas and other officers used excessive force against him at Pinckneyville, that a nurse denied him medical care, and that officials issued and adjudicated a false disciplinary ticket.

## PROCEDURAL HISTORY

Tatum's original complaint alleged that Warden Darren Galloway transferred him in retaliation for protected activity and was dismissed for failure to state a claim, with leave to amend. The amended complaint asserted

retaliation, excessive force, deliberate indifference to medical needs, and due process claims arising from events at Shawnee Correctional Center and Pinckneyville Correctional Center. The court dismissed Count 1 with prejudice, severed Counts 2 through 5 into a new case, directed the Clerk to transfer specified filings, and closed this case.

## DISPOSITION

dismissed

## CASES CITED

- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Owens v. Hinsley, 635 F.3d 950, 952 (7th Cir. 2011)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Hawkins v. Mitchell, 756 F.3d 983, 996 (7th Cir. 2014)
- Manuel v. Nalley, 966 F.3d 678, 680-81 (7th Cir. 2020)
- Zimmerman v. Tribble, 226 F.3d 568, 573 (7th Cir. 2000)
- 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)