

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Rodney A. Campbell v. St. Clair County Jail, et al.

Campbell · No. 4:26-cv-0065-MTS · Decided May 11, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri granted Rodney A. Campbell’s application to proceed without prepaying fees and assessed a one-dollar initial partial filing fee. The court determined that the St. Clair County Jail, the State of Illinois, and potentially the Fairview Heights Police Department were not proper defendants, and that venue was improper, directing dismissal of the action without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	May 11, 2026
DOCKET	4:26-cv-0065-MTS
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner brought a civil-rights action and applied to proceed in forma pauperis. The district court reviewed the pleading under the prisoner-screening statutes, granted the application, assessed a one-dollar initial partial filing fee, and dismissed the action without prejudice.
STANDARD OF REVIEW	The court reviewed the pleading during mandatory screening under 28 U.S.C. §§ 1915A(a) and 1915(e)(2)(B).
PRECEDENTIAL VALUE	unpublished
PARTIES	Rodney A. Campbell v. St. Clair County Jail, State of Illinois, Fairview Heights Police Department

TOPICS

- venue
- prisoners rights
- civil rights
- civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

venue

in forma pauperis proceedings

QUESTIONS PRESENTED

1. Whether Plaintiff should be permitted to proceed without prepaying the filing fee.
2. Whether the St. Clair County Jail and State of Illinois were proper defendants in the action.
3. Whether the Fairview Heights Police Department, assuming it was sufficiently named, was a proper defendant.
4. Whether venue was proper in the Eastern District of Missouri.
5. Whether the action should be dismissed without prejudice during statutory prisoner screening.

HOLDINGS

1. The court granted Plaintiff's application to proceed without prepaying fees or costs and assessed an initial partial filing fee of one dollar, while recognizing that his negative inmate-account balance appeared to make him unable to pay it immediately.
2. The St. Clair County Jail and the State of Illinois were not proper defendants to the action.
3. Assuming the Fairview Heights Police Department was sufficiently named as a defendant, it also was not a proper defendant.
4. Venue was improper in the Eastern District of Missouri, providing an independent ground for dismissal without prejudice.
5. The action was dismissed without prejudice because the named defendants were improper and venue was improper.

KEY QUOTATIONS

“A review of Plaintiff’s pleading shows that this action should be dismissed.” (at 1)

“Improper venue provides an additional ground for the dismissal of this action without prejudice.” (at 1)

FACTUAL BACKGROUND

Rodney A. Campbell, a pro se prisoner, filed a civil-rights action naming the St. Clair County Jail and the State of Illinois as defendants. He also identified the Fairview Heights Police Department elsewhere in the complaint, although it was not included in the caption. His inmate account statement showed a substantial negative balance, and the court determined that he appeared unable to pay the assessed initial partial filing fee.

PROCEDURAL HISTORY

Plaintiff filed this action against the St. Clair County Jail and the State of Illinois, and elsewhere identified the Fairview Heights Police Department as a defendant. The district court considered Plaintiff's application to proceed without prepaying fees or costs and reviewed the complaint under 28 U.S.C. §§ 1915(b)(4), 1915A(a),

and 1915(e)(2)(B)(i). The court concluded that the named entities were not proper defendants and that venue was improper, then ordered dismissal without prejudice.

DISPOSITION

dismissed

CASES CITED

- Owens v. Scott Cnty. Jail, 328 F.3d 1026, 1027 (8th Cir. 2003)
- Puerto Rico Aqueduct & Sewer Auth. v. Metcalf & Eddy, Inc., 506 U.S. 139, 144 (1993)
- Courtney v. City of Chicago, 439 F. App'x 557, 558 n.* (7th Cir. 2011)
- Kelly v. Martin, 78 F.3d 597 (10th Cir. 1996) (table decision)

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