

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PRECEDENTIAL VALUE	unpublished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)

OPINION

Campbell

PER CURIAM.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MISSOURI

EASTERN DIVISION

RODNEY A. CAMPBELL,)

) Plaintiff,)) vs.) Case No. 4:26-cv-0065-MTS) ST. CLAIR COUNTY JAIL, et al.,))
Defendants.)

MEMORANDUM AND ORDER

This matter is before the Court on pro se prisoner Plaintiff Rodney A. Campbell's Application to Proceed in District Court without Prepaying Fees or Costs. Doc. [9]. Upon review of Plaintiff's representations therein and his inmate account statement, the Court will grant the Motion. The Court assesses an initial partial filing fee in this matter of one dollar, see 28 U.S.C. § 1915(b)(1), but, given that he has a substantial negative balance in his inmate account, the Court notes that Plaintiff appears to be unable to pay an initial partial filing fee. For that reason, the Court will proceed to its review. See *id.* at §§ 1915(b)(4), 1915A(a). A review of Plaintiff's pleading shows that this action should be dismissed. Plaintiff brought this action against two Defendants, the St. Clair County Jail and the State of Illinois. Neither is a proper defendant. See *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).* What is more, were those even proper defendants, this Court is not the correct

* Though not in his caption, Plaintiff also lists the Fairview Heights Police Department as a defendant elsewhere in his Complaint. Assuming the Fairview Heights Police Department is sufficiently named as Defendant here, but see Fed. R. Civ. P. 10(a), it too is not a proper defendant, see *Courtney v. City of Chicago*, 439 F. App'x 557, 558 n.* (7th Cir. 2011). venue for this action.

See 28 U.S.C. § 1391(b). Improper venue provides an additional ground for the dismissal of this action without prejudice. /d. at § 1406(a); see also *Kelly v. Martin*, 78 F.3d 597 (10th Cir. 1996) (table decision) (noting a “court may raise sua sponte the issue of venue in the setting of a 1915 case”). Accordingly, IT IS HEREBY ORDERED that Plaintiff's Application to Proceed in District Court without Prepaying Fees or Costs, Doc. [8], is GRANTED. Plaintiff shall pay an initial partial filing fee to the Court of one dollar (\$1.00). Plaintiff shall make his remittance payable to “Clerk, United States District Court,” and include upon it: (1) his name; (2) his prison registration number; (3) the case number; and (4) the statement that the remittance is for an original proceeding. For the reasons discussed herein, the Court will enter herewith an Order of Dismissal, which will dismiss Plaintiffs action without prejudice. See 28 U.S.C. § 1915(e)(2)(B)(i1). Dated this 11th day of May 2026.) fe

UNITED STATES DISTRICT JUDGE

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