

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Michael Brown v. Peters, et al.

Brown · No. 25-1454 · Decided February 18, 2026

SUMMARY

The United States District Court for the Central District of Illinois screened Michael Brown’s pro se § 1983 complaint concerning allegedly religiously noncompliant Passover meals at Illinois River Correctional Center. The court dismissed the complaint without prejudice under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A for failure to adequately allege defendants’ personal involvement, while granting leave to amend within 30 days.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois
DECIDED	February 18, 2026
DOCKET	25-1454
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial merit review of a pro se incarcerated plaintiff's complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	At § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff's favor, but conclusory statements and labels are insufficient; the complaint must state a claim that is plausible on its face. The court also applies the Rule 12(b)(6) failure-to-state-a-claim standard.
PRECEDENTIAL VALUE	unpublished district court opinion; nonprecedential
PARTIES	Michael Brown v. Peters, Willis, Wilcoxen, Harmon, Knowles, Reneau, Smithers, Thousand, Lynette Boughan, Hubbard

TOPICS

- free exercise clause
- section 1983
- prisoners rights
- civil rights
- motions to dismiss

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

religious liberty

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a First Amendment free-exercise or RLUIPA claim based on the alleged provision of Passover meals containing yeast or leaven.
2. Whether the complaint adequately alleged personal involvement by the chaplain, dietary managers, and dietary supervisors in the alleged religious or constitutional deprivation.
3. Whether the alleged mishandling of grievances stated a personal-liability claim under 42 U.S.C. § 1983 against the grievance officer and counselor.
4. Whether the complaint should be dismissed without prejudice under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A, with leave to amend.

HOLDINGS

1. The complaint failed to state a claim against the chaplain, dietary managers, and dietary supervisors because it did not specifically allege that they personally participated in, or were deliberately indifferent to, the alleged provision of noncompliant Passover meals.
2. The complaint failed to state a claim against the grievance officer and counselor based solely on their alleged mishandling of Plaintiff's grievances because the complaint did not allege that they caused or participated in the underlying religious-food deprivation.
3. The complaint was dismissed without prejudice for failure to state a claim under Rule 12(b)(6) and § 1915A, and Plaintiff was granted a final opportunity to file an amended complaint within 30 days.

KEY QUOTATIONS

“Individuals in custody have a First Amendment right to reasonable opportunities to practice their religion, subject to the legitimate penological concerns of the prison.”

“Denying an inmate access to a diet that is required by his religion places a substantial burden on the inmate’s free exercise rights.”

“There is no respondeat superior under § 1983.”

“the alleged mishandling of [Plaintiff’s] grievances by persons who otherwise did not cause or participate in the underlying conduct states no claim.”

FACTUAL BACKGROUND

Michael Brown, an incarcerated Hebrew Israelite, alleged that he was approved to receive Passover meals at Illinois River Correctional Center in April 2025. He claimed that, unlike Jewish inmates who received commercially prepared Passover meals, Hebrew Israelite inmates received food containing yeast or leaven, including breaded chicken patties, saltine crackers, and cornbread. He further alleged that prison officials failed

to respond properly to his grievances and that supervisory dietary and chaplain defendants were responsible for the meal service.

PROCEDURAL HISTORY

Plaintiff filed a 42 U.S.C. § 1983 complaint alleging that prison officials violated his First Amendment religious-exercise rights and the Religious Land Use and Institutionalized Persons Act by providing Passover meals containing yeast or leaven. The district court screened the complaint and dismissed it without prejudice for failure to state a claim, granting Plaintiff 30 days to file a complete amended complaint.

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)
- Maddox v. Love, 655 F.3d 709 (7th Cir. 2011)
- Ortiz v. Downey, 561 F.3d 664, 669 (7th Cir. 2009)
- Isby-Israel v. Lemmon, No. 13-172, 2016 WL 3072177, at *4 (S.D. Ind. June 1, 2016)
- Koger v. Bryan, 523 F.3d 789, 798-99 (7th Cir. 2008)
- Thompson v. Holm, 809 F.3d 376, 380 (7th Cir. 2016)
- Nelson v. Miller, 570 F.3d 868, 879 (7th Cir. 2009)
- Sossamon v. Texas, 131 S. Ct. 1651, 1663 (2011)
- Grayson v. Schuler, 666 F.3d 450, 451 (7th Cir. 2012)
- Vance v. Peters, 97 F.3d 987, 991 (7th Cir. 1996)
- John Doe v. Purdue University, Doe v. Purdue Univ., 928 F.3d 652, 664 (7th Cir. 2019)
- Sanville v. McCaughtry, 266 F.3d 724, 740 (7th Cir. 2001)
- Owens v. Hinsley, 635 F.3d 950, 953 (7th Cir. 2011)

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