

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, URBANA DIVISION

Christopher Thompson v. Bart Beals

Thompson v. Beals · No. 2:26-cv-02003-JEH · Decided January 13, 2026

SUMMARY

The United States District Court for the Central District of Illinois conducted a merit review of Christopher Thompson’s pro se 42 U.S.C. § 1983 complaint against attorney Bart Beals. The court dismissed the complaint without prejudice because the allegations did not establish whether venue was proper, granted leave to amend within 30 days, and denied Thompson’s in forma pauperis petition with leave to renew using the required federal form.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Urbana Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Urbana Division
DECIDED	January 13, 2026
DOCKET	2:26-cv-02003-JEH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se civil-rights complaint under 42 U.S.C. § 1983. The court conducted a merit review under 28 U.S.C. § 1915A and dismissed the complaint without prejudice because the allegations did not establish that venue was proper in the Central District of Illinois. The court granted leave to amend and denied plaintiff's in forma pauperis petition with leave to renew.
STANDARD OF REVIEW	On merit review under 28 U.S.C. § 1915A, the court accepted factual allegations as true and liberally construed them in plaintiff's favor, but disregarded conclusory statements and required facts sufficient to state a facially plausible claim.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Christopher Thompson v. Bart Beals

TOPICS

venue pleadings section 1983 civil procedure

PRACTICE AREAS

civil procedure civil rights prisoner civil rights

QUESTIONS PRESENTED

1. Whether the complaint should be dismissed without prejudice because the allegations did not establish that venue was proper in the Central District of Illinois under 28 U.S.C. § 1391(b).
2. Whether plaintiff's petition to proceed in forma pauperis should be denied because it was filed on an Illinois state-court form rather than the federal district court's required short form.

HOLDINGS

1. The complaint was dismissed without prejudice because plaintiff's sparse allegations did not make clear that venue was proper in the Central District of Illinois under 28 U.S.C. § 1391(b).
2. The dismissal was without prejudice, and plaintiff was granted 30 days to file an amended complaint containing sufficient information about defendant, the underlying case, and all allegations against all defendants.
3. The in forma pauperis petition was denied with leave to renew because plaintiff used a form required by Illinois circuit courts rather than the federal district court's Application to Proceed in District Court Without Prepaying Fees or Costs short form.

KEY QUOTATIONS

“Therefore, Plaintiff’s Complaint is DISMISSED WITHOUT PREJUDICE.”

“If Plaintiff fails to file a timely Amended Complaint, or if the Amended Complaint fails to state a claim for relief, his case will be dismissed with prejudice.”

“The Amended Complaint must contain all allegations against all Defendants. Piecemeal amendments are not accepted.”

FACTUAL BACKGROUND

Plaintiff alleged that defendant attorney Bart Beals accepted payment to defend him while knowing that Beals's license would be suspended and that he would be unable to represent plaintiff. Plaintiff characterized the resulting harm as a violation of due process. The complaint did not identify the underlying case, its case number or county, or provide Beals's address or the location of his law office, leaving the proper federal venue unclear.

PROCEDURAL HISTORY

Thompson filed a complaint alleging that attorney Bart Beals accepted payment to represent him despite knowing that Beals's law license would be suspended. The district court reviewed the complaint under 28 U.S.C.

§ 1915A, found venue unclear based on the sparse allegations, dismissed the complaint without prejudice, and allowed 30 days to file an amended complaint. The court also denied plaintiff's in forma pauperis petition because it used an Illinois circuit-court form rather than the federal short form, allowing renewal.

DISPOSITION

dismissed

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649-51 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Wilson v. Ryker, 451 F. App'x 588, 589 (7th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)

OPINION

Thompson

PER CURIAM.

IN THE

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF ILLINOIS

URBANA DIVISION

CHRISTOPHER THOMPSON,

Plaintiff, v. Case No. 2:26-cv-02003-JEH

BART BEALS,

Defendant. Merit Review Order Plaintiff, proceeding pro se and currently detained at Jerome Combs Detention Center, filed a Complaint under 42 U.S.C. § 1983 alleging violations of his constitutional rights. (Doc. 1). This case is before the Court for a merit review pursuant to 28 U.S.C. § 1915A. In reviewing the Complaint, the Court accepts the factual allegations as true, liberally construing them in Plaintiff's favor. *Turley v. Rednour*, 729 F.3d 645, 649-51 (7th Cir. 2013). However, conclusory statements and labels are insufficient. Enough facts must be provided to "state a claim for relief that is plausible on its face." *Alexander v. United States*, 721 F.3d 418, 422 (7th Cir. 2013) (citation and internal quotation marks omitted). While the pleading standard does not require "detailed factual allegations," it requires "more than an unadorned, the-defendant-unlawfully-harmed-me accusation." *Wilson v. Ryker*, 451 F. App'x 588, 589 (7th Cir. 2011) (quoting *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)).

Plaintiff names Bart Beals, an attorney whose license was recently suspended, as the sole Defendant. Plaintiff alleges Defendant Beals accepted payment to defend him, even though Beals knew his license would be suspended and he would not be able to represent Plaintiff. As a result,

Plaintiff alleges “[his] due process was mess[ed] up.” (Doc. 1 at p. 5). Plaintiff did not provide any information about the case he paid Defendant Beals to represent him in, such as the case name, case number, or the county the case was filed in. Plaintiff also did not provide Defendant Beals’ address or what city or county his law office was located in. Venue for federal civil rights actions is governed by 28 U.S.C. § 1391(b). According to that statute, such actions may be brought only in (1) the judicial district where any defendant resides (if all defendants reside in the same State), (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, or (3) a judicial district in which any defendant may be found, if there is no district in which the action may otherwise be brought. According to an online search, it appears that Defendant Beals may be located in Cook County, but based on Plaintiff’s sparse allegations, it is unclear whether venue is proper in the United States District Court for the Central District of Illinois or the Northern District of Illinois. Therefore, Plaintiff’s Complaint is DISMISSED WITHOUT PREJUDICE. Within 30 days of this Order, Plaintiff is directed to file an Amended Complaint containing any additional information regarding Defendant Beals. Plaintiff must also provide additional information about the case he hired Defendant Beals for, such as the case name, number, and the county the case was filed in. If Plaintiff fails to file a timely Amended Complaint, or if the Amended Complaint fails to state a claim for relief, his case will be dismissed with prejudice. Plaintiff’s Amended Complaint will replace Plaintiff’s Complaint in its entirety. The Amended Complaint must contain all allegations against all Defendants. Piecemeal amendments are not accepted. IT IS THEREFORE ORDERED: 1) Plaintiff's Complaint is DISMISSED WITHOUT PREJUDICE, as it is unclear whether this Court is the proper venue for this action under 28 U.S.C. § 1391(b). The Court will allow Plaintiff the opportunity to file an Amended Complaint within 30 days of this Order. If Plaintiff fails to file a timely Amended Complaint, or if the Amended Complaint fails to state a claim for relief, his case will be dismissed with prejudice. Plaintiff's Amended Complaint will replace Plaintiff's Complaint in its entirety. The Amended Complaint must contain all allegations against all Defendants. Piecemeal amendments are not accepted. 2) Plaintiff filed a Petition to Proceed in forma pauperis [3] but did not file his Petition by using this Court's Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form). Instead, Plaintiff used a form required by Illinois Circuit Courts. Plaintiff's Petition [3] is DENIED, with leave to renew. Within 30 days of this Order, Plaintiff must pay the \$405 filing fee in full or file a renewed Petition by using this Court's Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form). Failure to comply without good cause will result in dismissal of this case without prejudice, and Plaintiff will still be responsible for payment of the filing fee. See 28 U.S.C. § 1914. The Clerk is directed to send Plaintiff the forms for proceeding in forma pauperis. It is so ordered. Entered: January 13, 2026 s/Jonathan E. Hawley
U.S. District Judge

