

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Jackson v. Lillard

No. 26-cv-216-JPG (S.D. Ill. Mar. 30, 2026) · No. 26-cv-216-JPG · Decided March 30, 2026

SUMMARY

The United States District Court for the Southern District of Illinois dismissed Ronald Jermaine Jackson’s petition for a writ of habeas corpus under 28 U.S.C. § 2241 with prejudice. The court held that, under *Jones v. Hendrix*, Jackson could not use § 2241 to collaterally attack his sentence, and imposed a \$200 sanction for filing the frivolous petition.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	J. Phil Gilbert
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 30, 2026
DOCKET	26-cv-216-JPG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner's 28 U.S.C. § 2241 habeas petition challenging the validity of his sentence was dismissed with prejudice, and petitioner was sanctioned \$200 for filing a frivolous repetitive petition.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum and order
PARTIES	Ronald Jermaine Jackson v. T. Lillard

TOPICS

- federal habeas corpus
- post-conviction relief
- sanctions
- motions to dismiss
- civil procedure

PRACTICE AREAS

- federal habeas corpus
- post-conviction relief
- sanctions

QUESTIONS PRESENTED

- Whether Jackson could use 28 U.S.C. § 2241 to collaterally attack the validity of his sentence.
- Whether Jackson's repetitive and frivolous petition should be dismissed with prejudice.

3. Whether the court could impose a \$200 sanction for filing the frivolous petition.

HOLDINGS

1. A federal prisoner may not use 28 U.S.C. § 2241 to collaterally attack the validity of his sentence under *Jones v. Hendrix*.
2. The court dismissed Jackson's repetitive and frivolous § 2241 petition with prejudice.
3. Jackson was ordered to pay the court \$200 as a sanction for filing the frivolous § 2241 petition.

KEY QUOTATIONS

“As with Jackson’s earlier § 2241 petitions, in light of Jones v. Hendrix, 599 U.S. 465 (2023), he may not use § 2241 to collaterally attack his sentence.”

“Accordingly, the Court DISMISSES with prejudice Jackson’s instant petition (Doc. 1) and DIRECTS the Clerk of Court to enter judgment accordingly.”

FACTUAL BACKGROUND

Ronald Jermaine Jackson was incarcerated at the Federal Correctional Institution in Greenville, Illinois, where T. Lillard was the warden. Jackson's petition challenged the validity of his sentence rather than the fact or duration of his confinement, and the court characterized his claims as repetitive and frivolous based on earlier § 2241 petitions.

PROCEDURAL HISTORY

Jackson filed a § 2241 petition in the Southern District of Illinois challenging his sentence. The court relied on the Supreme Court's decision in *Jones v. Hendrix* and prior orders rejecting Jackson's repetitive petitions, dismissed the petition with prejudice, directed entry of judgment, and imposed a \$200 sanction.

DISPOSITION

dismissed

CASES CITED

- *Jones v. Hendrix*, 599 U.S. 465 (2023)
- *Jackson v. Lillard*, No. 24-cv-2687-NJR, 2025 WL 1234150, at *3 (S.D. Ill. Apr. 29, 2025)
- *Alexander v. United States*, 121 F.3d 312, 315 (7th Cir. 1997)
- *Jackson v. Lillard*, No. 25-cv-542-DWD (S.D. Ill. Apr. 29, 2025)

OPINION

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS
RONALD JERMAINE JACKSON, No. 22096-041, Petitioner, Case No. 26-cv-216-JPG v. T. LILLARD, Respondent. MEMORANDUM AND ORDER This matter comes before the Court on

petitioner Ronald Jermaine Jackson's petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 (Doc. 1).

The petitioner is incarcerated at the Federal Correctional Institute at Greenville, Illinois, where respondent T. Lillard is the warden. The petitioner is challenging the validity of his sentence, not the fact or duration of his confinement.

As with Jackson's earlier § 2241 petitions, in light of *Jones v. Hendrix*, 599 U.S. 465 (2023), he may not use § 2241 to collaterally attack his sentence. Jackson's claims have been repeatedly rejected as frivolous by courts in this district. Then-Chief Judge Nancy J. Rosenstengel warned Jackson that, as a sanction, future repetitive habeas corpus petitions would be deemed rejected, without the need for judicial action, 30 days after the petition is filed unless the court orders otherwise.

Jackson v. Lillard, No. 24-cv-2687- NJR, 2025 WL 1234150, at *3 (S.D. Ill. Apr. 29, 2025) (citing *Alexander v. United States*, 121 F.3d 312, 315 (7th Cir. 1997)). Accordingly, the Court DISMISSES with prejudice Jackson's instant petition (Doc. 1) and DIRECTS the Clerk of Court to enter judgment accordingly. Further, pursuant to District Judge David W. Dugan's April 29, 2025, order in *Jackson v. Lillard*, No. 25-cv-542-DWD, the Court ORDERS that Jackson shall pay the Court \$200.00 as a sanction for filing this frivolous § 2241 petition.

The instructions for filing a notice of appeal given in Judge Dugan's aforementioned order apply. IT IS SO ORDERED. DATED: March 30, 2026 of Od Aid J. PHIL GILBERT DISTRICT JUDGE