

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

Charles Flynn v. Illinois Department of Corrections, et al.

Flynn · No. 3:25-cv-03218-JEH · Decided December 8, 2025

SUMMARY

The United States District Court for the Central District of Illinois dismissed Charles Flynn’s Second Amended Complaint under 28 U.S.C. § 1915A and Federal Rule of Civil Procedure 12(b)(6). The court held that Flynn failed to state a First Amendment access-to-courts claim concerning allegedly missing outgoing legal mail and failed to state constitutional claims based on alleged conduct by prison law-library personnel and grievance officials. The dismissal was with prejudice, counted as a potential strike under 28 U.S.C. § 1915(g), and the clerk was directed to close the case and enter judgment.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	December 8, 2025
DOCKET	3:25-cv-03218-JEH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Merit review of a pro se incarcerated plaintiff’s Second Amended Complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	On § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff’s favor, but disregards conclusory statements and labels and determines whether the complaint states a plausible claim for relief. The dismissal standard is the same failure-to-state-a-claim standard applied under Federal Rule of Civil Procedure 12(b)(6).
PRECEDENTIAL VALUE	Unpublished district court merit review order; generally nonprecedential.

TOPICS

section 1983 prisoners rights first amendment motions to dismiss appellate procedure

PRACTICE AREAS

prisoner civil rights constitutional law civil procedure appellate procedure

QUESTIONS PRESENTED

1. Whether the allegations that prison mail was stolen or failed to reach the Mason and Sangamon County Circuit Clerks stated a First Amendment access-to-courts claim.
2. Whether the alleged failure by prison employees to provide or copy an order concerning a waiver of court fees stated a constitutional claim.
3. Whether prison officials incurred constitutional liability by denying, mishandling, or concurring in the denial of plaintiff's grievances.
4. Whether the Second Amended Complaint should be dismissed with prejudice under 28 U.S.C. § 1915A and Federal Rule of Civil Procedure 12(b)(6).

HOLDINGS

1. Plaintiff failed to state a First Amendment claim based on the alleged nonreceipt or theft of mail sent to the Mason and Sangamon County Circuit Clerks because he did not identify which defendants were responsible for the alleged interference.
2. The alleged failure by Defendant Hunt to provide an order accompanying a fee-waiver application and Defendant Ross's initial refusal to provide a copy of the order did not state cognizable constitutional claims.
3. The denial or mishandling of a prison grievance, without more, does not establish a constitutional violation, and high-level officials generally cannot be held liable merely because they denied a grievance concerning a completed act of misconduct.
4. The Second Amended Complaint was dismissed with prejudice for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) and 28 U.S.C. § 1915A because further amendment would be futile.

KEY QUOTATIONS

“A claim is legally insufficient if it “(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.” (Section I)

“The denial or mishandling of a grievance is not enough to establish a constitutional violation.” (Section III)

“Plaintiff’s Second Amended Complaint is DISMISSED WITH PREJUDICE for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) and § 1915A.” (Disposition)

FACTUAL BACKGROUND

Plaintiff alleged that prison mail procedures resulted in the loss or nonreceipt of motions he mailed to the Mason and Sangamon County Circuit Clerks. He also alleged that a notary and law-library employee failed to provide or copy an order concerning a waiver of court fees, contributing to the denial of a motion in one of his criminal cases. Plaintiff pursued prison grievances concerning the mail and law-library incidents, but prison officials denied or concurred in the denial of those grievances.

PROCEDURAL HISTORY

Plaintiff filed a Second Amended Complaint under 42 U.S.C. § 1983 alleging that prison officials interfered with his legal mail, access to courts, law-library assistance, and grievances. The district court screened the complaint under § 1915A, concluded that it failed to state a constitutional claim, dismissed it with prejudice under Federal Rule of Civil Procedure 12(b)(6) and § 1915A, directed the Clerk to close the case and record a strike under § 1915(g), and advised plaintiff regarding appeal and filing-fee obligations.

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)
- Rowe v. Shake, 196 F.3d 778, 782 (7th Cir. 1999)
- Lewis v. Casey, 518 U.S. 343 (1996)
- Owens v. Hinsley, 635 F.3d 950, 953 (7th Cir. 2011)
- Smith v. Engelage, 2020 WL 5369886, at *4 (S.D. Ill. Sept. 8, 2020)
- George v. Smith, 507 F.3d 605, 609-10 (7th Cir. 2007)
- Aguilar v. Gaston-Camara, 861 F.3d 626, 633 (7th Cir. 2017)
- Burks v. Raemisch, 555 F.3d 592, 595 (7th Cir. 2009)
- Celske v. Edwards, 164 F.3d 396, 398 (7th Cir. 1999)
- Walker v. O'Brien, 216 F.3d 626, 632 (7th Cir. 2000)