

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

Jeffery Todd Henson, Sr. v. Dr. Jamarco Clark and Dr. Jantzen
Eddington

Henson v. Clark, No. 25-cv-1184 (C.D. Ill. Mar. 2026) · No. 25-cv-1184 · Decided March 16, 2026

SUMMARY

The United States District Court for the Central District of Illinois granted defendants’ motion to dismiss a pro se plaintiff’s procedural due process claims arising from the denial of his admission to the University of Illinois Springfield. The court held that sovereign immunity barred the claims against the defendants in both their individual and official capacities and that the Ex parte Young exception did not apply because no ongoing violation existed. The court also held that the plaintiff failed to identify a protected property or liberty interest in a fair or individualized university admissions process, while granting leave to amend within 21 days.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Colleen R. Lawless
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	March 16, 2026
DOCKET	25-cv-1184
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983 for alleged procedural due process violations arising from the denial of his admission to the University of Illinois Springfield. Defendants moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). Plaintiff also objected to a magistrate judge's denial of his motion to recuse.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true, construes the complaint in the plaintiff's favor, and asks whether it states a plausible claim for relief. Rule 12(b)(1) permits dismissal for lack of subject matter jurisdiction, including where

	sovereign immunity bars the action. Pro se complaints are liberally construed.
PRECEDENTIAL VALUE	Unpublished federal district court opinion; persuasive value only
PARTIES	Jeffery Todd Henson, Sr. v. Dr. Jamarco Clark, Dr. Jantzen Eddington

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QUESTIONS PRESENTED

1. Whether sovereign immunity barred Henson's § 1983 claims against the defendants in their individual capacities when the requested injunction would compel the University of Illinois Springfield to reconsider his application.
2. Whether the Ex parte Young exception to sovereign immunity permitted Henson's official-capacity claim for prospective injunctive relief based on an alleged ongoing procedural due process violation.
3. Whether Henson plausibly alleged a constitutionally protected property or liberty interest in a fair and individualized university admission review sufficient to state a procedural due process claim under § 1983.
4. Whether the magistrate judge's denial of Henson's motion to recuse required disqualification under 28 U.S.C. § 455(a).

HOLDINGS

1. Henson's individual-capacity claims were barred because the only remaining requested relief was an injunction compelling the University of Illinois Springfield, an alter ego of the State of Illinois, to reconsider his application; the remedy was therefore truly against the sovereign rather than the individual defendants.
2. The Ex parte Young exception did not apply because Henson failed to allege an ongoing violation of federal law. The University granted an extension and provided appellate review, curing any alleged procedural defects.
3. Henson failed to state a procedural due process claim because he did not plausibly allege a constitutionally protected property or liberty interest in fair or individualized admission review.
4. Henson's objection to the magistrate judge's denial of recusal was denied because judicial rulings ordinarily provide grounds for appeal, not disqualification, absent exceptional circumstances.

KEY QUOTATIONS

“The more challenging aspect of Ex parte Young analysis is the proviso that the suit must seek relief against an ‘ongoing’ violation of federal law.” (6)

“Process is not an end in itself. . . . The State may choose to require procedures . . . but in making that choice the State does not create an independent substantive right.” (9)

FACTUAL BACKGROUND

Jeffery Todd Henson, Sr. sought admission to the University of Illinois Springfield while on supervised release for nonviolent, white-collar felony convictions. The University denied admission, and Henson alleged that it had promised an individualized risk assessment and, if necessary, remote attendance; he also alleged deficiencies in the appeal process, including denial of a second extension, inability to confirm receipt of supplemental materials, and failure to provide a requested meeting. The University ultimately reviewed and rejected his appeal, explaining that the severity of the offense justified denial and encouraging him to reapply after completing supervised release and demonstrating rehabilitation.

PROCEDURAL HISTORY

Henson sued university officials in their individual and official capacities after the University of Illinois Springfield denied his admission based on his felony convictions and rejected his appeal. He voluntarily withdrew his Title VI and Illinois Human Rights Act claims. The district court granted defendants' motion to dismiss the remaining procedural due process claim, denied Henson's Rule 72(a) objection to the recusal ruling, denied his motion for status as moot, and granted leave to amend within 21 days.

DISPOSITION

other

CASES CITED

- Franchise Tax Board v. Hyatt, 587 U.S. 230, 237-38 (2019)
- Gerlach v. Rokita, 95 F.4th 493, 498-99 (7th Cir. 2024)
- Lewis v. Clarke, 581 U.S. 155, 161-63, 162, 166 (2017)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 & n.10 (1989)
- Luder v. Endicott, 253 F.3d 1020, 1023 (7th Cir. 2001)
- Malhotra v. University of Illinois at Urbana-Champaign, 77 F.4th 532, 535-37 (7th Cir. 2023)
- Pennhurst State School & Hospital v. Halderman, 465 U.S. 89, 101 n.11 (1984)
- Ex parte Young, 209 U.S. 123, 159-60 (1908)
- Verizon Maryland, Inc. v. Public Service Commission, 535 U.S. 635, 645-46 (2002)
- Driftless Area Land Conservancy v. Valcq, 16 F.4th 508, 522, 524 (7th Cir. 2021)
- Sonnleitner v. York, 304 F.3d 704, 706, 717-18 (7th Cir. 2002)
- Green v. Mansour, 474 U.S. 64, 68 (1985)
- Papasan v. Allain, 478 U.S. 265, 277-78 (1986)

- Council 31 of the American Federation of State, County & Municipal Employees v. Quinn, 680 F.3d 875, 884 (7th Cir. 2012)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Arnett v. Webster, 658 F.3d 742, 751 (7th Cir. 2011)
- Board of Regents v. Roth, 408 U.S. 564, 577 (1972)
- Williams v. Wendler, 530 F.3d 584, 589-90 (7th Cir. 2008)
- Charleston v. Board of Trustees of the University of Illinois at Chicago, 741 F.3d 769, 773-74 (7th Cir. 2013)
- Olim v. Wakinekona, 461 U.S. 238, 250-51 (1983)
- Park v. Indiana University School of Dentistry, 692 F.3d 828, 832 (7th Cir. 2012)
- Hook v. McDade, 89 F.3d 350, 355 (7th Cir. 1996)

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