

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

Crawford v. Lukas

729 F.3d 645 · No. 2:26-cv-02011-SEM · Decided May 18, 2026

SUMMARY

The United States District Court for the Central District of Illinois screened DeAndre Crawford’s 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915A. The court allowed First Amendment retaliation claims against Defendants Hardy, Lukas, and Wall and a First Amendment Free Exercise Clause claim against Lukas and Wall to proceed in their individual capacities, while dismissing other claims and denying Crawford’s motion for counsel. The court directed service of process and provided related case-management instructions.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Urbana Division
WRITING FOR THE COURT	Sue E. Myerscough
JURISDICTION	United States District Court for the Central District of Illinois, Urbana Division
DECIDED	May 18, 2026
DOCKET	2:26-cv-02011-SEM
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights complaint under 42 U.S.C. § 1983 screened under 28 U.S.C. § 1915A. The court allowed First Amendment retaliation and Free Exercise Clause claims to proceed, dismissed or excluded other claims at the screening stage, denied appointed counsel with leave to renew, and deemed the motion for status moot.
STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915A, the court accepts well-pleaded factual allegations as true and liberally construes them in the plaintiff's favor, but disregards conclusory statements and labels and dismisses claims that are frivolous, malicious, fail to state a plausible claim, or seek monetary relief from an immune defendant.
PRECEDENTIAL VALUE	Unreported federal district court screening order; precedential status is unknown in the supplied metadata.

PARTIES

DeAndre Crawford v. Dailynn Hardy, Lukas, Wall

TOPICS

section 1983

prisoners rights

first amendment

free exercise clause

civil procedure

PRACTICE AREAS

civil rights

prisoners' rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff plausibly stated First Amendment retaliation claims based on alleged disciplinary tickets and threats issued after his refusal of medication and related protected conduct.
2. Whether Plaintiff plausibly stated a First Amendment Free Exercise Clause claim based on the alleged desecration of his Quran.
3. Whether the allegedly false disciplinary tickets and resulting disciplinary proceedings stated a due-process claim.
4. Whether Plaintiff stated an Eighth Amendment deliberate-indifference claim against Hardy based on denial of medication.
5. Whether Plaintiff was entitled to appointed counsel in this civil-rights action.

HOLDINGS

1. Plaintiff stated plausible First Amendment retaliation claims against Hardy, Lukas, and Wall.
2. Plaintiff stated a plausible Free Exercise Clause claim against Lukas and Wall based on the allegation that they placed his Quran in a toilet.
3. Plaintiff failed to state a due-process claim based on the allegedly false disciplinary tickets and proceedings.
4. Plaintiff failed to state an Eighth Amendment deliberate-indifference claim against Hardy.
5. Plaintiff was not entitled to appointed counsel at this stage because he had not demonstrated a reasonable attempt to obtain counsel.

KEY QUOTATIONS

“To make out a prima facie case of First Amendment retaliation, a plaintiff must establish that (1) he engaged in activity protected by the First Amendment, (2) he suffered a deprivation that would likely deter First Amendment activity in the future, and (3) the First Amendment activity was “at least a motivating factor” in the defendants’ decision to take the retaliatory action.”

“However, when an inmate’s “sanction is less onerous” than revocation of good time credits, prison officials “need not use all of the procedures required by Wolff when reaching decisions.””

“Plaintiff’s Motion for Counsel (Doc. 3) is denied with leave to renew, which renders Plaintiff’s Motion for Status moot.”

FACTUAL BACKGROUND

Plaintiff, an inmate, alleged that prison officials issued disciplinary tickets after disputes concerning his receipt or refusal of medication and after a search of his cell. He alleged that Lukas and Wall searched his cell, found a sewing needle, issued allegedly false disciplinary tickets, and placed his Quran in a toilet. Plaintiff appeared before an Adjustment Committee, pleaded not guilty, was found to have committed the charged violations, and was sent to segregation, but he did not allege that he lost good-time credits.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 complaint, a motion for counsel, and a motion for status. Upon screening the complaint under § 1915A, the court found plausible retaliation claims against Hardy, Lukas, and Wall and a plausible Free Exercise Clause claim against Lukas and Wall. The court rejected the asserted due-process and Eighth Amendment claims, denied counsel because Plaintiff had not shown reasonable efforts to obtain counsel, deemed the status motion moot, and directed service and further case management.

DISPOSITION

other

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)
- Herron v. Meyer, 820 F.3d 860, 863 (7th Cir. 2016)
- Fairley v. Andrews, 578 F.3d 518, 525 (7th Cir. 2009)
- Bridges v. Gilbert, 557 F.3d 541, 546 (7th Cir. 2009)
- Knight v. Grossman, 942 F.3d 336, 342-43 (7th Cir. 2019)
- McPherson v. McBride, 188 F.3d 784, 787 (7th Cir. 1999)
- Wolff v. McDonnell, 418 U.S. 539, 558 (1974)
- Chavis v. Rowe, 643 F.2d 1281, 1285 n.3 (7th Cir. 1981)
- Sylvester v. Hanks, 140 F.3d 713, 715 (7th Cir. 1998)
- Wilkinson v. Austin, 545 U.S. 209, 228-29 (2005)
- Westefer v. Neal, 682 F.3d 679, 684-86 (7th Cir. 2012)
- Ealy v. Watson, 109 F.4th 958, 966 (7th Cir. 2024)
- Adams v. Reagle, 91 F.4th 880, 895-96 (7th Cir. 2024)
- Hewitt v. Helms, 459 U.S. 460, 476 (1983)
- Kaufman v. Pugh, 733 F.3d 692, 696 (7th Cir. 2013)
- Kaufman v. McCaughtry, 419 F.3d 678, 682-83 (7th Cir. 2005)

- Walker v. Chambers-Smith, 2020 WL 1066506, at *4 (N.D. Ohio Mar. 5, 2020)
- Collignon v. Milwaukee County, 163 F.3d 982, 989 (7th Cir. 1998)
- Youngberg v. Romeo, 457 U.S. 307, 323 (1982)
- Jackson v. County of McLean, 953 F.2d 1070, 1071 (7th Cir. 1992)
- Pruitt v. Mote, 503 F.3d 647, 654 (7th Cir. 2007)

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