

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Ryan Barnes v. Brittany Greene, et al.

Barnes · No. 26-3069-SEM · Decided March 3, 2026

SUMMARY

The United States District Court for the Central District of Illinois denied Ryan Barnes’s motion to proceed in forma pauperis under the Prison Litigation Reform Act’s three-strikes provision. The court dismissed the action as a sanction for Barnes’s failure to disclose his prior federal lawsuits and accumulated strikes, which the court characterized as fraud upon the court. The court directed entry of judgment for the defendants and provided instructions concerning appeal and appellate filing fees.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Sue E. Myerscough
JURISDICTION	United States District Court for the Central District of Illinois
DECIDED	March 3, 2026
DOCKET	26-3069-SEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court conducted a merit review of Barnes's prisoner civil-rights complaint and considered his motion to proceed in forma pauperis under the Prison Litigation Reform Act's three-strikes provision.
STANDARD OF REVIEW	The court applied the PLRA merit-review and imminent-danger screening requirements under 28 U.S.C. §§ 1915A and 1915(g).
PRECEDENTIAL VALUE	Unpublished district court merit review order; persuasive authority only.
PARTIES	Ryan Barnes v. Brittany Greene, et al.

TOPICS

- prisoners rights
- civil rights
- sanctions
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Barnes qualified to proceed in forma pauperis despite having accumulated three or more PLRA strikes.
2. Whether Barnes alleged imminent danger of serious physical injury sufficient to invoke the exception to the PLRA three-strikes rule.
3. Whether dismissal was an appropriate sanction for Barnes's failure to disclose his prior federal litigation and three-strikes status.

HOLDINGS

1. A prisoner with three or more qualifying PLRA strikes may proceed in forma pauperis only if the complaint sufficiently alleges that the prisoner was under imminent danger of serious physical injury when the complaint was filed. Barnes did not satisfy that requirement, so his motion to proceed in forma pauperis was denied.
2. Dismissal is an appropriate sanction when a litigant lies to the court to obtain the benefit of proceeding in forma pauperis, and the court dismissed Barnes's case as a sanction for failing to disclose his prior federal lawsuits and PLRA strikes.

KEY QUOTATIONS

“In no event shall a prisoner bring a civil action or appeal a judgment in a civil action or proceeding under this section if the prisoner has, on 3 or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.”

“More specifically, “we have held that a dismissal with prejudice is an appropriate sanction for lying to the court in order to receive a benefit from it, because no one needs to be warned not to lie to the judiciary.””

FACTUAL BACKGROUND

Ryan Barnes was incarcerated in the Illinois Department of Corrections at Western Illinois Correctional Center and sought to proceed in forma pauperis. He had accumulated at least four prior PLRA strikes from earlier federal cases. Despite being warned on the complaint form about the three-strikes rule, Barnes represented that he had never previously filed a federal lawsuit while incarcerated and did not disclose his prior strikes.

PROCEDURAL HISTORY

Barnes filed a complaint and sought leave to proceed in forma pauperis. The court determined that he had accumulated at least three qualifying strikes under the PLRA and had not alleged imminent danger of serious physical injury. The court also found that Barnes misrepresented his prior federal litigation and three-strikes status, denied IFP status, dismissed the action for failure to pay the filing fee and as a sanction for fraud on the court, denied other motions as moot, vacated scheduled hearings, and directed entry of judgment for defendants.

DISPOSITION

dismissed

CASES CITED

- *Heimerman v. Litscher*, 337 F.3d 781, 782 (7th Cir. 2003)
- *Lewis v. Sullivan*, 279 F.3d 526, 531 (7th Cir. 2002)
- *Ciarpaglini v. Saini*, 352 F.3d 328, 330 (7th Cir. 2003)
- *Fletcher v. Deathridge*, 2008 WL 4724173, at *2 (C.D. Ill. Oct. 23, 2008)
- *Ayoubi v. Dart*, 640 F. App'x 524, 528-29 (7th Cir. 2016)
- *Mathis v. N.Y. Life Ins. Co.*, 133 F.3d 546, 547 (7th Cir. 1998)
- *Sanders v. Melvin*, 25 F.4th 475, 481 (7th Cir. 2022)
- *Hoskins v. Dart*, 633 F.3d 541, 543-44 (7th Cir. 2011)
- *Thomas*, 288 F.3d at 308
- *Celske v. Edwards*, 164 F.3d 396, 398 (7th Cir. 1999)
- *Walker v. O'Brien*, 216 F.3d 626, 632 (7th Cir. 2000)