

25-6146 ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

WILLIAM ROBERSON,  
Petitioner,

v.  
SHERIFF TOM DART,  
Respondent.

Supreme Court, U.S.  
FILED

SEP - 4 2025

OFFICE OF THE CLERK

On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Seventh Circuit

PETITION FOR A WRIT OF CERTIORARI

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Date: 10/30/2025

## PETITION FOR WRIT OF CERTIORARI

### QUESTIONS PRESENTED

Whether the Establishment Clause of the First Amendment is violated when a pretrial detainee is compelled to attend a court hearing conducted in the sanctuary of a religious chapel under threat of punishment for failure to appear.

Whether a constitutional claim under the Establishment Clause may be dismissed solely because the plaintiff cannot identify the specific official responsible for selecting the religious venue, despite clear evidence of government involvement.

Whether federal courts may impose procedural burdens under the Prison Litigation Reform Act (PLRA) on plaintiffs who were no longer incarcerated at the time of filing their civil rights complaint.

## **PARTIES TO THE PROCEEDING**

Petitioner: William Roberson

Respondent: Sheriff Tom Dart

## **OPINIONS BELOW**

The decision of the United States Court of Appeals for the Seventh Circuit is unpublished. The opinion of the United States District Court for the Northern District of Illinois dismissing the amended complaint is also unpublished.

## **JURISDICTION**

The judgment of the Court of Appeals was entered on June 24, 2025. This Court's jurisdiction is invoked under 28 U.S.C. § 1254(1).

Further, this court sent a letter of deficiency on September 16, 2025, and requested that changes be made in order for the court to continue to review this petition

## **CONSTITUTIONAL PROVISIONS INVOLVED**

U.S. Const. amend. I

U.S. Const. amend. XIV

## STATEMENT OF THE CASE

Petitioner, while detained at Cook County Jail, was ordered to attend a remote court hearing. The only available video terminal was located in the sanctuary of a chapel within the jail. The chapel contained overtly Christian religious symbols, including an altar and iconography. Petitioner was compelled to attend under threat of punishment for failure to appear. Upon exiting, he tripped over a pew and sustained physical injuries.

Petitioner filed a civil rights complaint under 42 U.S.C. § 1983 alleging a violation of the Establishment Clause. The district court dismissed the original complaint but granted leave to amend, requiring Petitioner to name a single defendant and prohibiting reference to legal precedent. The amended complaint named only Sheriff Tom Dart in his official capacity. It described the events and asserted that compelling attendance in a chapel for court proceedings violated the Establishment Clause.

The district court dismissed the amended complaint with prejudice, holding that Petitioner failed to state a claim. The court ruled that Petitioner had not alleged that Sheriff Dart was personally involved in the venue decision, nor that there was any official policy or custom related to the use of the chapel. The Seventh Circuit affirmed, explicitly declining to address the constitutional claim and relying entirely on the absence of a “proper defendant.”

## REASONS FOR GRANTING THE WRIT

### I. LOWER COURTS REFUSED TO ADDRESS THE CONSTITUTIONAL VIOLATION BASED ON PROCEDURAL GROUNDS

The Seventh Circuit dismissed the claim solely because Petitioner could not name the official responsible for choosing the chapel. This contradicts **Hope v. Pelzer, 536 U.S. 730 (2002)**, which held that constitutional violations should be evaluated on substance, not procedural obstacles.

### II. GOVERNMENT LIABILITY WITHOUT NAMING AN INDIVIDUAL — County of Allegheny and Hafer v. Melo

In County of Allegheny, this Court upheld an Establishment Clause claim without identifying the person who placed a religious display inside a courthouse. In Hafer, the Court reaffirmed § 1983 official capacity claims. Petitioner followed this precedent by naming Sheriff Dart.

### III. RELIGIOUS COERCION REQUIRES JUDICIAL SCRUTINY

In Lee v. Weisman and Town of Greece, the Court held that subtle coercion may violate the Establishment Clause. Petitioner's compelled appearance in a Christian chapel for court mirrors those precedents.

#### IV. DENIAL OF DISCOVERY BLOCKED FAIR REVIEW

Petitioner was denied discovery and a further amendment opportunity to identify responsible parties or establish a county-wide policy or custom.

#### V. MISAPPLICATION OF THE PLRA

Petitioner was not incarcerated at the time of filing, yet the court applied PLRA standards and barred him from citing controlling case law, unfairly heightening his burden. This misapplication directly conflicts with precedent holding that the PLRA does not extend to non-incarcerated litigants and mirrors the type of judicial overreach cautioned against in **Jones v. Bock, 549 U.S. 199 (2007)**, where this Court emphasized that courts may not expand the statute's reach or impose stricter conditions than Congress enacted.

#### VI. NATIONAL IMPORTANCE

This case asks whether government officials may compel participation in judicial proceedings in a religious setting and evade liability through bureaucratic complexity. Clarification from this Court is needed to protect First Amendment freedoms.

#### CONCLUSION

For the foregoing reasons, the petition for a writ of certiorari should be granted.

Respectfully submitted,  
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## TABLE OF AUTHORITIES

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