

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Submitted June 16, 2026*

Decided July 20, 2026

Before

FRANK H. EASTERBROOK, *Circuit Judge*

JOHN Z. LEE, *Circuit Judge*

REBECCA TAIBLESON, *Circuit Judge*

No. 25-1373

CHARLES STOKES, Beneficiary,
Plaintiff-Appellant,

Appeal from the United States District
Court for the Northern District of
Illinois, Eastern Division.

v.

No. 24 C 3716

JASON GARNETT, Trustee, Chief of
Parole Division for Illinois DOC,
Defendant-Appellee.

Jorge L. Alonso,
Judge.

ORDER

Charles Stokes, who is serving mandatory supervised release in Illinois, challenges the dismissal of his complaint under 42 U.S.C. § 1983 asserting that he was

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

unlawfully confined beyond the end of his sentence. But a writ of habeas corpus—not § 1983—is the proper vehicle for such a challenge, so we affirm.

We accept as true the facts alleged in Stokes’s complaint and give him the benefit of all reasonable inferences from those allegations. *Courtney v. Butler*, 66 F.4th 1043, 1046 (7th Cir. 2023). In 2010, Stokes pleaded guilty to predatory criminal sexual assault. He says he was sentenced to eight years’ imprisonment, a term of which he would be required to serve at least 85%, as well as three years’ mandatory supervised release. But after serving his prison sentence, he claims, he could not find housing suitable for supervised release, so he was held in prison for another six years. He was not released until January 13, 2021, and he states that he is now serving an indefinite term of supervised release.

In 2024, he brought this civil-rights suit against Jason Garnett, the Chief of Parole for the Illinois Department of Corrections. *See* 42 U.S.C. § 1983. Stokes alleged that Garnett unlawfully incarcerated him for six years beyond his original release date and unconstitutionally enforced conditions of supervised release for an indefinite period, even though his sentence supposedly only imposed three years of supervised release. Stokes sought damages and an order preventing Garnett from continuing to enforce the supervised-release conditions.

The district court granted Garnett’s motion to dismiss the complaint for failure to state a claim. The court pointed out, first, that there is no respondeat superior liability under § 1983, and Stokes failed to allege that Garnett personally caused the alleged constitutional deprivation. The court also determined that Stokes’s claims were barred under *Heck v. Humphrey*, 512 U.S. 477, 486–87 (1994), because his sentence had not first been declared invalid.

We do not need to reach the *Heck* issue because Stokes should have filed a petition for a writ of habeas corpus, not a claim under § 1983. The thrust of Stokes’s complaint is that despite being sentenced to a finite, three-year term of mandatory supervised release, he is now serving a term that is indefinite. If Stokes’s allegations are true, he has likely already served his term of mandatory supervised release. In effect, then, Stokes is seeking to enforce his sentence and hold the State to only a three-year term of mandatory supervised release.

The Supreme Court has held time and again that when the relief a state prisoner “seeks is a determination that he is entitled to immediate release or a speedier release from that imprisonment, his sole federal remedy is a writ of habeas corpus.” *Preiser v.*

Rodriguez, 411 U.S. 475, 500 (1973); see also *Wilkinson v. Dotson*, 544 U.S. 74, 81 (2005) (“[T]he Court has focused on the need to ensure that state prisoners use only habeas corpus (or similar state) remedies when they seek to invalidate the duration of their confinement—either *directly* through an injunction compelling speedier release or *indirectly* through a judicial determination that necessarily implies the unlawfulness of the State’s custody.” (emphasis in original)). “Challenges ‘close to the core of habeas corpus’ must be brought, if at all, under ‘the specific federal habeas corpus statute’—[such as] § 2254—which was ‘explicitly and historically designed to provide the means for a state prisoner to attack the validity of his confinement.’” *Fernandez v. United States*, 608 U.S. --, 146 S. Ct. 1292, 1301 (2026) (quoting *Preiser*, 411 U.S. at 489). This is true for challenges, like Stokes’s, to a term of supervised release, which “is considered part of a defendant’s sentence.” *Pettis v. United States*, 129 F.4th 1057, 1061 (7th Cir. 2025); see also *United States v. Kappes*, 782 F.3d 828, 837 (7th Cir. 2015). Stokes may not short-circuit this process and “use a § 1983 action to challenge the fact or duration of his confinement.” *Wilkinson*, 544 U.S. at 78 (citation modified). If Stokes wishes to challenge the imposition of these conditions, he must do so in a habeas proceeding. See *Tobey v. Chibucos*, 890 F.3d 634, 651 (7th Cir. 2018); *Williams v. Wisconsin*, 336 F.3d 576, 579–80 (7th Cir. 2003).

AFFIRMED