NOTICE
This Order was filed under Supreme Court Rule 23 and is not precedent except in the limited circumstances allowed under Rule 23(e)(1).

2026 IL App (4th) 260283-U

NOS. 4-26-0283, 4-26-0561 cons.

FILED
November 12, 2026
Carla Bender
4th District Appellate
Court, IL

IN THE APPELLATE COURT

OF ILLINOIS

FOURTH DISTRICT

RYAN C. ARMSTRONG, Plaintiff-Appellant, v. THE WARREN COUNTY SHERIFF'S OFFICE and THE WARREN COUNTY STATE'S ATTORNEY'S OFFICE, Defendants-Appellees.	)	Appeal from the Circuit Court of Warren County No. 25LA10 Honorable William A. Rasmussen, Judge Presiding.

RYAN C. ARMSTRONG, Plaintiff-Appellant, v. THE KNOX COUNTY SHERIFF'S OFFICE and THE KNOX COUNTY STATE'S ATTORNEY'S OFFICE, Defendants-Appellees.	)	Appeal from the Circuit Court of Knox County No. 25LA35 Honorable Kenneth J. Hogan, Judge Presiding.

PRESIDING JUSTICE STEIGMANN delivered the judgment of the court.
Justices Doherty and Cavanagh concurred in the judgment.

ORDER

¶ 1 *Held*: The appellate court affirmed the trial courts' dismissals of plaintiff's complaints and warned plaintiff of the possibility of sanctions if he files future frivolous pleadings.

¶ 2 In November 2025, plaintiff, Ryan C. Armstrong, appearing *pro se*, filed nearly identical complaints against defendants, the Warren County Sheriff's Office and the Warren County State's Attorney's Office, in Warren County case No. 25-LA-10 and defendants, the Knox

County Sheriff's Office and the Knox County State's Attorney's Office, in Knox County case No. 25-LA-35 seeking relief based on allegations Armstrong had been harmed in various ways, including having numerous childhood ideas of his stolen through mind control by unnamed entities. Armstrong alleged he first complained to defendants about the allegations in 2020 or 2021, but they failed to investigate, prosecute, and protect him. Based on those allegations, Armstrong asserted four "Causes of Action:" (1) a violation of Armstrong's civil rights under section 1983 of title 42 of the United States Code (42 U.S.C. § 1983 (2020)), (2) intentional infliction of emotional distress, (3) declaratory relief, and (4) injunctive relief.

¶ 3 Defendants in each case filed motions to dismiss under sections 2-615 and 2-619 of the Code of Civil Procedure (Code) (735 ILCS 5/2-615, 2-619 (West 2024)), alleging, in part, (1) Armstrong failed to state a cause of action, (2) Armstrong's claims were barred by the applicable statutes of limitations, (3) claims against the sheriff's office were barred by provisions of the Local Governmental and Governmental Employees Tort Immunity Act (Immunity Act) (745 ILCS 10/1-101 *et seq.* (West 2024)), and (4) claims against the state's attorney's office were barred by absolute prosecutorial immunity. The trial courts granted the motions, finding Armstrong failed to state a cause of action, the actions were time-barred, and defendants had absolute immunity.

¶ 4 Armstrong appeals. We affirm and warn Armstrong that he will be subject to sanctions if he files further frivolous pleadings.

¶ 5 I. BACKGROUND

¶ 6 A. The Complaints

¶ 7 In November 2025, Armstrong filed complaints against defendants seeking relief based on allegations that he had been harmed in various ways as a child and throughout his life, including having numerous childhood ideas of his stolen through mind control by unnamed

entities. Armstrong included statements of facts alleging that he was a "serial victim" who had been subject to physical, sexual, and mental abuse throughout his life. Armstrong alleged he had no memory of 25 years of his life due to violent crimes that resulted in his suffering from severe cognitive and physical disabilities.

¶ 8 Armstrong also alleged he "came up with" over 200 designs, design plans, inventions, and other improvements as a child that should have earned him enough money to make him a billionaire. He then asserted that those ideas were taken from him through mind control, stating he had been "criminally violated with weaponized mind-control technology for [his] entire life." Armstrong referred to "mind-control violators" but did not specifically name anyone in the complaints.

¶ 9 In the Warren County case, Armstrong also alleged that, in 2013, he was forced by mind control to flee in a vehicle pursuit involving a Warren County sheriff's deputy, ultimately resulting in his arrest. Armstrong alleged the Warren County State's Attorney's Office charged him with crimes as a result of that incident, even though that office was aware of his brain injury and facts pertaining to mind control.

¶ 10 In the Knox County case, Armstrong alleged the Knox County State's Attorney's Office unlawfully charged him multiple times while ignoring evidence. Armstrong alleged that every time he had been "unlawfully" arrested in Knox County, he "was violated with mind-control" and "forced through each incident as a completely innocent victim."

¶ 11 Armstrong alleged he prepared evidence and repeatedly turned it into local, state, federal, and media entities in 2020 or 2021. He stated he had submitted over 900 e-mails and 500 complaints to authorities but never received a "lawful response." He also alleged he had prepared a document over 1,040 pages long documenting his "testimony evidence," criminal profile, "court

argument," and "request for protection."

¶ 12 Armstrong further alleged defendants intentionally neglected him and failed to investigate, prosecute, or otherwise act on the information he reported. Armstrong claimed the sheriff's offices had been working in collusion with the "violators." He contended that the state's attorney's offices failed to protect him and instead "unlawfully" charged him multiple times.

¶ 13 Based on those allegations, Armstrong asserted four "Causes of Action:" (1) a violation of his civil rights under section 1983 (42 U.S.C. § 1983 (2020)), (2) intentional infliction of emotional distress, (3) declaratory relief, and (4) injunctive relief. Armstrong's claims were based on defendants' "intentional failure to investigate, prosecute and protect."

¶ 14 B. Armstrong's Evidence Documents

¶ 15 In December 2025, Armstrong filed a document in each case consisting of over 1,000 single-spaced pages of rambling accusations and often conclusory assertions of fact. Armstrong entitled the documents as his "Court Evidence/Complaint/Argument" (evidence documents) and included a notice of filing stating it was his "testimony evidence" in the cases. He also stated the documents included his criminal profile and court argument.

¶ 16 In those documents, Armstrong detailed the numerous injuries he had suffered over the years by numerous people or entities and made numerous allegations of mind control causing him to behave in various ways. Armstrong also listed hundreds of ideas or designs he alleged others stole from him via mind control when he was child, including things such as Facebook, Only Fans, Netflix, AmeriCorps, farmers' unions, food pantries, drones, dog doors, and rubber dog bones. He also detailed reports that he gave to defendants and others. We have reviewed the documents and need not provide further details about them here, other than to note that the factual assertions and accusations in them are fanciful, bizarre, irrational, and incredible.

¶ 17 C. The Motions To Dismiss

¶ 18 Defendants filed motions to dismiss under sections 2-615 and 2-619 of the Code (735 ILCS 5/2-615, 2-619 (West 2024)), arguing, in relevant part, that (1) Armstrong failed to state a cause of action, (2) Armstrong's claims were barred by the applicable statutes of limitations, (3) the claims against the sheriff's offices were barred by provisions of the Immunity Act, and (4) the claims against the state's attorney's offices were barred by absolute prosecutorial immunity.

¶ 19 Armstrong filed responses, claiming (1) the limitations periods were tolled due to his legal disability, (2) defendants were not immune from liability because their conduct was willful and wanton and the sheriff's offices owed Armstrong a special duty, and (3) his complaints set forth valid causes of action that were pleaded with sufficient specificity. In his responses, Armstrong referred to his evidence documents, which he refiled in each case.

¶ 20 D. The Hearings on the Motions

¶ 21 The trial courts conducted hearings on the motions in each case. In the Warren County case, Armstrong told the court he had been "violated" nearly all of his life and was severely cognitively disabled because of repetitive severe brain injuries. He stated he started documenting evidence in 2019. When asked about concerns that the complaint lacked specificity, Armstrong stated he alleged facts stating the designs or ideas were stolen from him by large companies. Armstrong argued defendants had a duty to protect him from intellectual property theft and violent crimes.

¶ 22 Armstrong also asserted, "Mind control technology being used as a weapon is a big part of my court case." The trial court asked Armstrong if he was contending the sheriff's office and the state's attorney's office engaged in mind control. Armstrong responded he was not, but he

then stated, "[T]hey have worked alongside in collusion with mind control being used as a weapon against me." When asked for an example and who Armstrong believed had controlled his mind and how defendants assisted them, Armstrong replied, "Who is yet to be determined" and stated he could "only imagine organizations who are guilty."

¶ 23 In the Knox County case, Armstrong stood on his written response.

¶ 24 The trial courts granted the motions to dismiss, finding in each case that (1) Armstrong failed to state a cause of action, (2) defendants had absolute immunity, and (3) the action was time-barred.

¶ 25 These appeals followed. On our own motion, we consolidate the appeals for disposition.

¶ 26 II. ANALYSIS

¶ 27 Armstrong appeals, arguing that the trial courts erred by granting the motions to dismiss because (1) the limitations periods were tolled due to Armstrong's legal disability or an ongoing injury, (2) defendants were not immune from prosecution because their conduct was willful and wanton, and (3) the rulings concerning the lack of a cause of action were arbitrary. He also argues in each case various additional alleged errors by the courts, such as the courts failed to consider his evidence documents or other evidence, relied on fabricated evidence, failed to identify themselves, denied access to the courts, and provided an inaccurate record. We disagree and affirm.

¶ 28 A. Preliminary Matters

¶ 29 We initially address several preliminary matters. First, although we may affirm based on any single correct ground for the dismissal of the complaints, for the benefit of future courts and in the interest of establishing *res judicata* in the event of any further similar filings by Armstrong, we address all three grounds for dismissal.

¶ 30 Second, we note that although the Knox County defendants did not file an appellee's brief, (1) the Warren County defendants did file a brief, (2) the record in this case is simple, and (3) we are able to decide the issues on appeal without the aid of a brief from the Knox County defendants. See *First Capitol Mortgage Corp. v. Talandis Construction Corp.*, 63 Ill. 2d 128, 133 (1976).

¶ 31 Third, we have reviewed Armstrong's evidence documents, which were filed separately from his complaints, and do not construe them as part of the complaints. Instead, these appear to be documents of unsworn testimony intended to be presented at any trial that might occur. In any event, to the extent those documents could be construed as part of the complaints, doing so would not change our analysis. In the places in which the matters in the documents pertain directly to Armstrong's asserted causes of action, the facts asserted therein are fanciful, bizarre, irrational, and incredible. We further note that these same claims from Armstrong have been found "factually frivolous" on multiple occasions by the federal courts. See, *e.g.*, *Armstrong v. United States Federal Government*, No. 4:25-cv-04194-SLD-DJQ, 2025 WL 3229302 (C.D. Ill. Nov. 19, 2025).

¶ 32 B. Section 2-615 and 2-619 Motions To Dismiss

¶ 33 Defendants moved to dismiss the complaints under both sections 2-615 and 2-619 of the Code (735 ILCS 5/2-615, 2-619 (West 2024)). A motion to dismiss under section 2-615 "attacks the legal sufficiency of the complaint" and "raises the question of whether the complaint's allegations, when viewed in the light most favorable to the plaintiff, sufficiently state a cause of action on which relief can be granted." (Internal quotation marks omitted.) *Tate Road Solar 1, LLC v. County of Winnebago*, 2026 IL App (4th) 250873, ¶ 17. When ruling on a section 2-615 motion, "the court only considers (1) those facts apparent from the face of the pleadings, (2) matters subject

to judicial notice, and (3) judicial admissions in the record." (Internal quotation marks omitted.) *Id.* "We review *de novo* a trial court's ruling on a section 2-615 motion to dismiss." *Id.*

¶ 34 A motion to dismiss under section 2-619 of the Code (735 ILCS 5/2-619 (West 2024)) "provides for the involuntary dismissal of a cause of action based on certain defects or defenses." *Richter v. Prairie Farms Dairy, Inc.*, 2016 IL 119518, ¶ 18. "In ruling on the motion, the circuit court must interpret all pleadings and supporting documents in the light most favorable to the nonmoving party." *Id.* "A section 2-619 motion to dismiss presents a question of law, which we review *de novo*." *Id.*

¶ 35 C. Armstrong Failed To State a Cause of Action

¶ 36 We agree with the trial courts that Armstrong failed to state a cause of action. Armstrong asserted causes of action based on defendants' failure to detect, investigate, prosecute, or protect against various perceived harms he attributed to the use of mind control against him by unnamed corporations or other entities.

¶ 37 Armstrong's causes of actions were based on (1) a federal civil rights claim under section 1983 of title 42 of the United States Code (42 U.S.C. § 1983 (2020)) and (2) intentional infliction of emotional distress. His remaining "Causes of Action" were essentially remedial requests for an injunction and declaratory judgment based on his section 1983 and emotional distress claims.

¶ 38 1. *Section 1983*

¶ 39 In a civil rights action, the government has a duty to protect an individual from harm imposed by private actors only when the government has taken an affirmative act of restraining that individual's freedom to act on his own behalf, such as through incarceration, institutionalization, or other similar restraint of personal liberty. *DeShaney v. Winnebago County*

Department of Social Services, 489 U.S. 189, 200 (1989). Aside from a civil rights action, "[o]rdinarily, a person has no affirmative duty to protect another from harmful or criminal acts by a third person." *Regions Bank v. Joyce Meyer Ministries, Inc.*, 2014 IL App (5th) 130193, ¶ 9. There are various exceptions, particularly if there has been a voluntary undertaking (*id.*), but we conclude that those exceptions are not applicable here.

¶ 40 In the present case, Armstrong did not plead facts to show defendants engaged in an affirmative act of restraining his freedom to act on his own behalf. Defendants did not have a duty to protect Armstrong from the actions of private parties, and Armstrong has not sufficiently pleaded any applicable exception. Armstrong claims that defendants colluded with unnamed entities to harm him through mind control, but he did not provide any details concerning the alleged collusion. Even if we were able to find such conclusory allegations sufficient in cases involving more typical allegations, we hold that under the circumstances here, where Armstrong alleged fanciful, bizarre, irrational, and incredible allegations concerning mind control, he has not pleaded a cause of action. To the extent Armstrong alleges defendants failed to protect him from other harms, such a physical harms he endured as a child, defendants did not have such a duty, and Armstrong has not sufficiently pleaded specific facts to show that an exception applies.

¶ 41 2. *Intentional Infliction of Emotional Distress*

¶ 42 In order to establish intentional infliction of emotional distress, a plaintiff must prove: (1) the defendant engaged in " 'extreme and outrageous' " conduct toward the plaintiff; (2) the defendant intended or recklessly disregarded the probability that the conduct would cause the plaintiff to suffer emotional distress; (3) the plaintiff endured " 'severe or extreme' " emotional distress; and (4) the defendant's conduct actually and proximately caused the plaintiff's distress. *Ulm v. Memorial Medical Center*, 2012 IL App (4th) 110421, ¶ 39 (quoting *Hayes v. Illinois*

Power Co., 225 Ill. App. 3d 819, 826 (1992)). Although this is a fact-intensive inquiry, whether the conduct is "extreme and outrageous" is assessed by an objective standard and, as a result, is a question of law for the court to decide. *Id.* "To state an action for intentional infliction of emotional distress, the complaint must be 'specific, and detailed beyond what is normally considered permissible in pleading a tort action.' " *Welsh v. Commonwealth Edison Co.*, 306 Ill. App. 3d 148, 155 (1999) (quoting *McCaskill v. Barr*, 92 Ill. App. 3d 157, 158 (1980)).

¶ 43 In this case, because defendants had no duty to detect, investigate, prosecute, or protect Armstrong from alleged mind control or other harms inflicted upon Armstrong as a child, they did not engage in extreme and outrageous conduct. Further, because Armstrong's claims are based on fanciful, bizarre, irrational, and incredible allegations, he has failed to state a cause of action.

¶ 44 D. Immunity

¶ 45 Even if Armstrong had stated a cause of action, we also agree with the trial courts that both the sheriff's offices and the state's attorney's offices were absolutely immune from Armstrong's lawsuit.

¶ 46 1. *The Sheriff's Offices*

¶ 47 Armstrong's state-law claims against the sheriff's offices are barred by the Immunity Act (745 ILCS 10/1-101 *et seq.* (West 2024)).

¶ 48 Section 4-102 of the Immunity Act pertains to "police protection" and provides as follows:

> "Neither a local public entity nor a public employee is liable for failure to establish a police department or otherwise provide police protection service or, if police protection service is provided, for failure to provide adequate police protection or

> service, failure to prevent the commission of crimes, failure to detect or solve crimes, and failure to identify or apprehend criminals. This immunity is not waived by a contract for private security service, but cannot be transferred to any non-public entity or employee." *Id.* § 4-102.

¶ 49 Armstrong contends immunity does not apply because the sheriff's offices' actions were willful and wonton under section 2-202 of the Immunity Act (*id.* § 2-202). However, "[s]ection 4-102 does not contain any exceptions and absolutely immunizes local public entities and their employees for both negligent and willful and wanton conduct in failing to protect or in providing inadequate police protection services." *Andrade v. City of Kankakee*, 2023 IL App (3d) 230035, ¶ 16. "Further, section 4-102 is broad in its scope and has been applied in a wide range of circumstances." *Id.*

¶ 50 Section 2-202 of the Immunity Act provides that "[a] public employee is not liable for his act or omission in the execution or enforcement of any law unless such act or omission constitutes willful and wanton conduct." 745 ILCS 10/2-202 (West 2020). "Unlike section 4-102, section 2-202 is narrow in scope and applies only if the public employee was actually executing or enforcing the law at the time of the acts or omissions at issue." *Alkafaween v. Village of New Lenox*, 2026 IL App (3d) 250449, ¶ 33.

¶ 51 In the present case, Armstrong based his causes of action on defendants' alleged failures to detect, investigate, prosecute, or protect Armstrong from alleged mind control or other harms inflicted upon Armstrong as a child. He did not allege with any specificity that defendants were actually executing or enforcing the law at the time they failed to do so.

¶ 52 Armstrong also suggests defendants owed him a special duty to protect him, providing an exception to absolute immunity. However, for a special duty exception to apply,

(1) the defendants must be uniquely aware of the particular danger or risk to which the plaintiff is exposed, (2) there must be specific acts or omissions on the part of the defendants, (3) the specific acts must be affirmative or willful, and (4) the injury must occur while the plaintiff is under the direct and immediate control of defendants. *Doe v. Calumet City*, 161 Ill. 2d 374, 386 (1994). In addition, the public agent must initiate the circumstance at issue to be in direct or immediate control of the plaintiff. *Id.* at 387-88.

¶ 53 In the present case, Armstrong has not alleged defendants initiated the circumstances at issue or were in control of him. Instead, he alleged they failed to detect, investigate, prosecute, or protect him from the alleged circumstances. To the extent Armstrong alleged defendants colluded with entities who engaged in mind control, his allegations were conclusory and lacked specificity. Further, as previously noted, the allegations were fanciful, bizarre, irrational, and incredible. Thus, a special duty exception does not apply.

¶ 54 Similarly, Armstrong argues an exception applies based on a state-created danger or equitable estoppel. However, his arguments again depend on his conclusory assertions defendants colluded with third parties who were engaged in mind control. As previously discussed, Armstrong did not state facts with sufficient specificity to support such a fanciful claim. The sheriff's offices here had absolute immunity from Armstrong's alleged causes of action.

¶ 55 2. *The State's Attorney's Offices*

¶ 56 The state's attorney offices also have absolute immunity from Armstrong's alleged causes of action.

¶ 57 "Both Illinois and federal courts have recognized the common-law doctrine of absolute prosecutorial immunity." *Kirichkow v. Bruscato*, 2025 IL App (4th) 240552, ¶ 21. Prosecutors have absolute immunity from section 1983 suits taken within the scope of their

prosecutorial duties. *Imbler v. Pachtman*, 424 U.S. 409, 424-29 (1976); *Frank v. Garnati*, 2013 IL App (5th) 120321, ¶¶ 6-8 (citing *Imbler*). In addition, "the common law in Illinois has long recognized such an absolute immunity for prosecutors when acting within the scope of their prosecutorial duties." *Frank*, 2013 IL App (5th) 120321, ¶ 9. "Thus, '[l]ike judges, prosecutors acting in the course of their duties are afforded absolute immunity from all acts, even malicious acts.' " *Kirichkow*, 2025 IL App (4th) 240552, ¶ 21 (quoting *Frank*, 2013 IL App (5th) 120321, ¶ 21). Determining whether to initiate a criminal proceeding and maintain a prosecution against a criminal defendant are activities intimately associated with the judicial phase of the criminal process and subject to absolute immunity. See *id.* ¶ 23.

¶ 58 Here, Armstrong alleged the state's attorney's offices failed to prosecute his unnamed "violators." The state's attorney's offices had absolute immunity regarding those decisions. As with the sheriff's offices, Armstrong has not pleaded anything giving rise to an exception, nor has he provided a cogent argument on appeal that any exceptions apply.

¶ 59 E. The Applicable Statutes of Limitation

¶ 60 Next, we conclude that Armstrong's claims were barred by the applicable statutes of limitation.

¶ 61 Because section 1983 does not provide a specific statute of limitations, the state law personal injury statute of limitations and its related tolling provisions apply to a section 1983 claim. *Ray v. Maher*, 662 F.3d 770, 772-73 (7th Cir. 2011). Under Illinois law, the statute of limitations for personal injury actions is two years. 735 ILCS 5/13-202 (West 2024). Accordingly, in Illinois, the limitations period for a section 1983 claim is two years. *Pearl v. Lee*, 403 Ill. App. 3d 197, 209 (2010) (citing *Northen v. Chicago*, 126 F.3d 1024, 1026 (7th Cir. 1997)). The limitations period for Armstrong's emotional distress claim is also two years. *Feltmeier v.*

Feltmeier, 207 Ill. 2d 263, 278 (2003).

¶ 62 Armstrong asserted that he began reporting his alleged claims to defendants and other entities in 2020 or 2021, yet he did not file suit until 2024. As a result, his action was facially barred by the statutes of limitation. Nonetheless, Armstrong contends the statutory periods were tolled because he was under a legal disability or a continuing violation existed based on defendants' continued failure to act.

¶ 63 "When a potential plaintiff has a legal disability, the statute of limitations is tolled until the plaintiff is no longer disabled." *Parks v. Kownacki*, 193 Ill. 2d 164, 178 (2000). When a legal disability is alleged, the record must contain sufficient allegations of fact from which one could conclude the person seeking to be found legally disabled was incompetent or suffered from a serious mental disorder that left the person entirely without understanding or capacity to make or communicate decisions regarding his or her person and totally unable to manage his or her estate or financial affairs. *In re Doe*, 301 Ill. App. 3d 123, 127 (1998). A person is not legally disabled if he or she can comprehend the nature of the injury and its implications. *Id.*

¶ 64 In the present case, Armstrong alleged a legal disability without stating particulars and did not allege he was incompetent or entirely without understanding or capacity. Instead, he stated he began reporting the claims in 2020 or 2021, and he authored a lengthy evidence document about his claims. His acts show that he comprehended the nature of his alleged injuries and their implications.

¶ 65 Armstrong argues in his brief that an ongoing injury or continuous violation existed, which tolled the limitation periods. Continuing torts or a continuing or repeated injury may toll the statute of limitations. *Feltmeier*, 207 Ill. 2d at 278. Under the continuing violation rule, the statute of limitations does not begin to run until the date of the last injury or when the tortious acts cease.

Id. However, a "single overt act" causing "continual ill effects" is not a continuing tort. *Id.* at 278-79.

¶ 66 Armstrong did not allege specific facts of a repeated ongoing injury in his complaint and did not sufficiently raise or argue that such an injury existed in his response to the motion to dismiss. Accordingly, he has fortified any such argument. See, *e.g.*, *Williams v. Bruscato*, 2019 IL App (2d) 170779, ¶ 24 ("[A]n appellant who fails to raise an issue before the trial court forfeits the issue and may not raise it for the first time on appeal."). Armstrong also conflates an ongoing injury with his allegations that defendants simply continued to refuse to change their stance that they were not required to detect, investigate, prosecute, or protect Armstrong from the alleged mind control or past injuries. However, continuing refusals to act are not continuing torts.

¶ 67 F. Additional Issues

¶ 68 Last, Armstrong argues in each case various additional alleged errors by the trial courts, such as the courts (1) failed to consider his evidence documents or other evidence, (2) relied on fabricated evidence, (3) failed to identify themselves, (4) denied him access to the courts, and (5) provided an inaccurate record.

¶ 69 Because Armstrong never raised those issues during the hearings on the motions to dismiss and did not file motions to reconsider raising the issues before he filed his appeal, they are forfeited. *Id.* Further, forfeiture aside, we have reviewed the issues and conclude they are not well grounded in fact or law and frivolous.

¶ 70 G. Potential for Sanctions

¶ 71 Having determined the trial courts correctly dismissed Armstrong's complaints for all the reasons stated in their orders, we further take this opportunity to warn Armstrong of the potential for sanctions for filing frivolous pleadings.

¶ 72 We note the United States District Court for the Central District of Illinois has repeatedly dismissed as factually frivolous actions filed by Armstrong alleging the same fanciful, bizarre, irrational, and incredible claims that corporations or other entities have stolen ideas from him through mind control or otherwise harmed him. In the first such case, filed against over 80 entities, the district court specifically found Armstrong's allegations bizarre, irrational, and incredible. *Armstrong v. United States Federal Government*, No. 4:23-cv-04139-SLD-JEH, 2023 WL 7005376 (C.D. Ill. Oct. 24, 2023); see 28 U.S.C. § 1915(e)(2)(B)(i) (2020).

¶ 73 In the second case, the district court noted Armstrong filed a short complaint against over one hundred defendants but was precluded from doing so by the ruling in the first case because the basis of the two suits was the same. See *Armstrong*, No. 4:25-cv-04194-SLD-DJQ, 2025 WL 3229302, at *1 (discussing *Armstrong v. United States Federal Government*, No. 4:25-cv-04007-SLD (C.D. Ill. Feb. 11, 2025). Alternatively, the court found the suit was factually frivolous. *Id.* The court warned Armstrong that any substantially similar complaints he filed in the future would be dismissed. *Id.*

¶ 74 In the third case, the district court dismissed yet again a similar frivolous pleading alleging the same frivolous facts. *Id.* Based on Armstrong's repeatedly filing substantially similar frivolous lawsuits, the court considered in a separate action whether to take further action to restrict his filing privileges. *Id.* at *2. A copy of that action appears in the record in Armstrong's appeal from the Knox County suit, showing that, in February 2026, the district court restricted Armstrong from filing *pro se* pleadings without leave of the court and stated that the court would deny leave to file any frivolous or duplicative complaints. *Armstrong v. United States Federal Government*, No. 4:25-mc-04028-SLD (C.D. Ill. Feb. 20, 2026).

¶ 75 Keeping in mind Armstrong's history of filing frivolous pleadings based on the

same frivolous allegations, we direct Armstrong's attention to Illinois Supreme Court Rule 375(b) (eff. Feb. 1, 1994) pertaining to frivolous appeals, which provides the following:

> "If, after consideration of an appeal or other action pursued in a reviewing court, it is determined that the appeal or other action itself is frivolous, or that an appeal or other action was not taken in good faith, for an improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation, or the manner of prosecuting or defending the appeal or other action is for such purpose, an appropriate sanction may be imposed upon any party or the attorney or attorneys of the party or parties. An appeal or other action will be deemed frivolous where it is not reasonably well grounded in fact and not warranted by existing law or a good-faith argument for the extension, modification, or reversal of existing law. An appeal or other action will be deemed to have been taken or prosecuted for an improper purpose where the primary purpose of the appeal or other action is to delay, harass, or cause needless expense.
>
> Appropriate sanctions for violation of this section may include an order to pay to the other party or parties damages, the reasonable costs of the appeal or other action, and any other expenses necessarily incurred by the filing of the appeal or other action, including reasonable attorney fees.
>
> A reviewing court may impose a sanction upon a party or an attorney for a party upon the motion of another party or parties, or on the reviewing court's own initiative where the court deems it appropriate. If the reviewing court initiates the sanction, it shall require the party or attorney, or both, to show cause why such a sanction should not be imposed before imposing the sanction. Where a sanction is

imposed, the reviewing court will set forth the reasons and basis for the sanction in its opinion or in a separate written order."

We further note that the trial court is authorized to impose sanctions for frivolous pleadings under Illinois Supreme Court Rule 137(a) (eff. Jan. 1, 2018).

¶ 76 We caution Armstrong that, should he continue to file frivolous pleadings based on fanciful, bizarre, irrational, and incredible facts, he may be subject to sanctions in the trial court for the frivolous pleadings and subject to sanctions in the appellate court for any appeal from adverse trial court judgments against him in frivolous actions.

¶ 77 III. CONCLUSION

¶ 78 For the reasons stated, the judgments of the trial courts are affirmed.

¶ 79 Affirmed.