

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Williams v. Vargas

Civil No. 3:22-cv-01075 (TOF) (D. Conn. Mar. 1, 2026) · No. 3:22-cv-01075 (TOF) · Decided March 1, 2026

SUMMARY

The court rules on the plaintiff’s motion in limine in a First Amendment Free Exercise Clause action brought by a parolee against his parole officer under 42 U.S.C. § 1983. The court excludes evidence of post-Ramadan curfew violations on the current record but permits evidence of pre-Ramadan violations, alcohol use, and certain criminal convictions, subject to specified limitations. The motion is therefore granted in part and denied in part.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                        |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Connecticut                                                                                                                                                                                                           |
| WRITING FOR THE COURT | Thomas O. Farrish                                                                                                                                                                                                                                                      |
| JURISDICTION          | United States District Court for the District of Connecticut                                                                                                                                                                                                           |
| DECIDED               | March 1, 2026                                                                                                                                                                                                                                                          |
| DOCKET                | 3:22-cv-01075 (TOF)                                                                                                                                                                                                                                                    |
| DISPOSITION           | other                                                                                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | Plaintiff moved in limine before trial to exclude evidence of alleged curfew violations, alcohol use and GPS battery failure, criminal history, and behavior toward residential-facility staff. The court granted the motion in part and denied it in part.            |
| STANDARD OF REVIEW    | A motion in limine should exclude evidence only when it is clearly inadmissible on all potential grounds; the moving party bears the burden of establishing inadmissibility. The court may reserve judgment until trial to assess the evidence in its factual context. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                        |
| PARTIES               | Steven Williams v. Brenda Vargas                                                                                                                                                                                                                                       |

TOPICS

- motion in limine
- evidence
- relevance
- character evidence
- impeachment

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether evidence of Williams's alleged curfew violations before and after Ramadan was relevant and admissible under the Federal Rules of Evidence.
2. Whether evidence of Williams's alcohol use and a GPS battery failure was inadmissible as irrelevant, unfairly prejudicial, or impermissible other-acts evidence.
3. Whether Williams's felony convictions could be admitted under Rules 404(b) and 609 for purposes of showing Vargas's state of mind or impeaching Williams.
4. Whether evidence of Williams's behavior toward residential-facility staff should be excluded on the current record.

## HOLDINGS

1. Evidence of Williams's alleged curfew violations before Ramadan was relevant and was not clearly inadmissible on the grounds of irrelevance, unfair prejudice, propensity, character, or jury confusion. The evidence could bear on whether Vargas had legitimate penological interests justifying the Ramadan curfew reduction.
2. On the current record, evidence of curfew violations occurring after May 1, 2022, was excluded because Vargas identified no consequential fact that such violations would make more or less probable.
3. Evidence of Williams's alcohol use was not clearly inadmissible and could be introduced because it was relevant both to the sincerity of his asserted religious belief and to his compliance with parole conditions and the legitimacy of Vargas's supervisory objectives.
4. The request to exclude evidence of a GPS battery failure was denied without prejudice because the issue was too undeveloped to support a pretrial exclusion order.
5. The court could not conclude on the current record that Williams's burglary and assault convictions were inadmissible under Rule 404(b). With a proper testimonial foundation, his felony history could be relevant to Vargas's state of mind concerning the steps necessary to supervise him.
6. Vargas could impeach Williams with his assault-on-a-public-safety-officer conviction under Rule 609(a)(1)(A), limited to the statutory name of the offense, the date of conviction, and the sentence imposed.
7. Vargas could impeach Williams with his more-than-ten-year-old burglary conviction under Rule 609(b), because its probative value substantially outweighed its prejudicial effect in this exceptional case.

## KEY QUOTATIONS

*“Evidence should be excluded on a motion in limine only when the evidence is clearly inadmissible on all potential grounds.”*

*“The motion will be granted to the extent that Officer Vargas shall not introduce or attempt to introduce evidence of curfew violations after May 1, 2022, including but not limited to the post-Ramadan portions of proposed Defendant’s Exhibits 512 and 513.”*

*“Although impeachment on a ten-and-a-half year-old conviction should be allowed only “rarely” and in “exceptional” cases, this is such a case.”*

## FACTUAL BACKGROUND

Williams, a parolee under Vargas's supervision, alleged that Vargas reduced his curfew from 9:00 p.m.–6:00 a.m. to 8:00 p.m.–6:00 a.m. during Ramadan 2022, preventing him from attending congregational Maghrib prayers and the Iftar meal. Vargas allegedly imposed the reduction in response to curfew violations occurring before Ramadan, and she was expected to rely on Williams's supervision history, alcohol use, and criminal convictions in explaining her actions and defending the legitimacy of her penological objectives. Williams also claimed that Vargas refused to accommodate his attendance at Ramadan services, while Vargas maintained that he never requested or needed such an accommodation.

## PROCEDURAL HISTORY

Williams brought a 42 U.S.C. § 1983 action against his parole officer, alleging that she violated his First Amendment free-exercise rights by reducing his curfew during Ramadan and refusing to permit attendance at Ramadan services. Before trial, he moved to preclude three categories of anticipated defense evidence. Vargas agreed not to introduce evidence concerning Williams's behavior toward residential-facility staff unless Williams opened the door, mooted that portion of the motion on the current record. The court then ruled on the remaining evidentiary issues.

## DISPOSITION

other

## CASES CITED

- Jean-Laurent v. Hennessy, 840 F. Supp. 2d 529, 536 (E.D.N.Y. 2011)
- Luce v. United States, 469 U.S. 38, 40 n.2 (1984)
- Wright v. Snyder, No. 3:21-cv-104 (SVN), 2024 WL 811998, at \*3 (D. Conn. Feb. 27, 2024)
- United States v. Paredes, 176 F. Supp. 2d 179, 181 (S.D.N.Y. 2001)
- Walker v. Schult, 365 F. Supp. 3d 266, 275 (N.D.N.Y. 2019)
- United States v. Pugh, 162 F. Supp. 3d 97, 101 (E.D.N.Y. 2016)
- Williams v. Vargas, No. 3:22-cv-1075 (SVN), 2022 WL 6771395, at \*4 (D. Conn. Oct. 11, 2022)
- Salahuddin v. Goord, 467 F.3d 263, 275 (2d Cir. 2006)
- Int'l Soc'y for Krishna Consciousness v. Barber, 650 F.2d 430, 441 (2d Cir. 1981)
- Gardner-Alfred v. Fed. Reserve Bank of New York, 143 F.4th 51, 64 (2d Cir. 2025)
- K.A. v. City of New York, No. 1:18-cv-3858 (ALC), 2023 WL 6393479, at \*7 (S.D.N.Y. Sept. 30, 2023)
- Carroll v. Trump, 124 F.4th 140, 156 (2d Cir. 2024)
- Brodeur v. Champion, No. 3:17-cv-1738 (RMS), 2019 WL 3717570, at \*4-5 (D. Conn. Aug. 7, 2019)
- Fraser v. Caribe, No. 3:20-cv-71 (SVN), 2023 WL 2889359, at \*1-2 (D. Conn. Apr. 11, 2023)

- United States v. Estrada, 430 F.3d 606, 615, 618-19 (2d Cir. 2005)
- Anderson v. Scanlon, No. 3:14-cv-829 (VAB), 2017 WL 3974994, at \*3 (D. Conn. Sept. 8, 2017)
- Ramos v. Trifone, No. 3:11-cv-679 (SALM), 2015 WL 6509114, at \*4 (D. Conn. Oct. 28, 2015)
- Smith v. Perez, No. 3:19-cv-1758 (VAB), 2023 WL 4540439, at \*5 n.5 (D. Conn. July 14, 2023)
- Jeanty v. Cerminaro, No. 6:16-cv-966 (BKS) (TWD), 2021 WL 2778572, at \*2 (N.D.N.Y. July 2, 2021)
- Zinman v. Black & Decker (U.S.), Inc., 983 F.2d 431, 434 (2d Cir. 1993)
- United States v. Mahler, 579 F.2d 730, 734 (2d Cir. 1978)
- Jones v. New York City Health & Hosps. Corp., 102 F. App'x 223, 226 (2d Cir. 2004)
- Casmento v. Volmar Constr., Inc., No. 20-cv-944 (LJL), 2022 WL 1094529, at \*4 (S.D.N.Y. Apr. 12, 2022)
- United States v. Gilbert, 668 F.2d 94, 97 (2d Cir. 1981)
- United States v. Ortiz, 553 F.2d 782, 784 (2d Cir. 1977)
- United States v. Lipscomb, 702 F.2d 1049, 1057 (D.C. Cir. 1983) (en banc)
- United States v. Hampton, No. CR-15-302, 2017 U.S. Dist. LEXIS 66771, at \*7-8 (E.D. Pa. May 2, 2017)
- United States v. Wise, 581 F. Supp. 3d 656, 658 (D.N.J. 2022)