

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ALABAMA

John Fabian Willis v. City of Mobile, et al.

Willis v. City of Mobile · No. Civil Action No. 24-0387-JB-B · Decided June 23, 2026

SUMMARY

The United States District Court for the Southern District of Alabama ruled on motions to dismiss claims arising from the arrest and prosecution of John Fabian Willis after he tendered 1996-series \$100 bills at a Walmart. The court dismissed the municipal-liability claim against the City of Mobile and the Fifth and Fourteenth Amendment claims against the individual officers. The court denied Walmart’s motion as to the false-imprisonment claim but dismissed the malicious-prosecution claim against Walmart.

CASE DETAILS

COURT	United States District Court for the Southern District of Alabama
WRITING FOR THE COURT	Jeffrey U. Beaverstock
JURISDICTION	United States District Court for the Southern District of Alabama
DECIDED	June 23, 2026
DOCKET	Civil Action No. 24-0387-JB-B
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff's amended civil-rights and state-law complaint was challenged by the City of Mobile, two police officers, and Walmart under Federal Rule of Civil Procedure 12(b)(6). The court granted the City's and officers' partial motion to dismiss and granted Walmart's motion in part while denying it in part.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and views them in the light most favorable to the plaintiff, asking whether the complaint states a plausible claim for relief.
PRECEDENTIAL VALUE	Unknown
PARTIES	John Fabian Willis v. City of Mobile, Detective Daniel Winter, Officer W. Grant, Walmart Inc.

TOPICS

motions to dismiss

section 1983

municipal liability

civil rights

torts

PRACTICE AREAS

Civil rights

Civil procedure

Municipal liability

Torts

QUESTIONS PRESENTED

1. Whether Willis plausibly alleged municipal liability against the City of Mobile based on a failure to train officers regarding authentication of older currency.
2. Whether Willis stated viable Fifth Amendment claims against municipal police officers.
3. Whether Willis plausibly alleged a Fourteenth Amendment due-process claim based on allegedly false arrest and detention.
4. Whether Willis plausibly alleged a Fourteenth Amendment class-of-one equal-protection claim.
5. Whether Walmart could be held vicariously liable for false imprisonment based on the alleged conduct of its security officer, Officer Miles.
6. Whether Willis plausibly alleged that Walmart was vicariously liable for malicious prosecution based on Officer Winter's conduct.

HOLDINGS

1. The complaint failed to state a plausible Monell failure-to-train claim against the City because it alleged neither a pattern of constitutional violations nor facts showing an obvious need for training regarding authentication of older currency.
2. Willis's Fifth Amendment claims against Officers Winter and Grant were not viable because the officers were not federal officers.
3. The complaint failed to state a Fourteenth Amendment due-process claim based on false imprisonment because it did not allege that Officers Winter or Grant deliberately continued to detain Willis after they knew or should have known he was entitled to release.
4. The complaint failed to state a class-of-one equal-protection claim because it did not allege that Willis was intentionally treated differently from persons similarly situated in all relevant respects.
5. Walmart's motion to dismiss the false-imprisonment claim was denied because the complaint alleged that Miles acted as Walmart's security guard and had not independently witnessed the alleged counterfeit-bill offense.
6. The complaint failed to state a malicious-prosecution claim against Walmart because it alleged no master-servant, principal-agent, or independent-contractor relationship between Walmart and Officer Winter and therefore did not allege that Walmart instituted or continued the prosecution.

KEY QUOTATIONS

"To impose liability on a municipality under § 1983, the plaintiff must identify a municipal policy or custom causing the deprivation of federal rights." (Section III.A)

“The Supreme Court has recognized that equal protection claims may be brought by a “class of one” when the plaintiff alleges that (1) he was intentionally treated differently from others similarly situated; and (2) there was no rational basis for the differential treatment.” (Section III.B.2)

FACTUAL BACKGROUND

Willis tendered five 1996-series \$100 bills at a Walmart store to make a credit-card payment. Walmart security officer Roderick Miles and Mobile police officers Daniel Winter and W. Grant arrested Willis for allegedly uttering counterfeit currency, and Willis remained jailed from October 20 through October 24, 2022, when he posted bail. After the bills were determined to be lawful currency, the criminal charges were nolle prossed.

PROCEDURAL HISTORY

Willis filed an action asserting claims under 42 U.S.C. § 1983 and Alabama-law claims for false imprisonment and malicious prosecution arising from his arrest after tendering 1996-series \$100 bills at a Walmart store. After an earlier round of motions to dismiss, the court allowed Willis to amend his complaint. The City, Detective Winter, and Officer Grant then filed a partial motion to dismiss, and Walmart separately moved to dismiss. The court granted the former motion in full, granted Walmart's motion as to malicious prosecution, and denied it as to false imprisonment.

DISPOSITION

other

CASES CITED

- *Speaker v. U.S. Department of Health & Human Services*, 623 F.3d 1371, 1379 (11th Cir. 2010)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555, 556, 570, 583 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974)
- *Williams v. Henry*, 2009 WL 3340465, at *2 (S.D. Ala. Oct. 15, 2009)
- *Magwood v. Secretary, Florida Department of Corrections*, 652 F. App'x 841, 843 (11th Cir. 2016)
- *Davila v. Delta Air Lines, Inc.*, 326 F.3d 1183, 1185 (11th Cir. 2003)
- *Monell v. Department of Social Services*, 436 U.S. 658, 691-94 (1978)
- *McDowell v. Brown*, 392 F.3d 1283, 1289 (11th Cir. 2004)
- *Gold v. City of Miami*, 151 F.3d 1346, 1350-52 (11th Cir. 1998)
- *Vineyard v. County of Murray, Georgia*, 990 F.2d 1207, 1212 (11th Cir. 1993)
- *West v. Lakatos*, 2025 WL 3442824, at *4 (11th Cir. Dec. 1, 2025)
- *City of Canton, Ohio v. Harris*, 489 U.S. 378, 390 & n.10 (1989)
- *Galloway v. City of Abbeville, Ala.*, 871 F. Supp. 2d 1298, 1308 (M.D. Ala. 2012)
- *Gaston v. City of Leesburg*, 2025 WL 252437, at *3 (11th Cir. Jan. 21, 2025)
- *Plaisance v. Yelder*, 408 So. 2d 136 (Ala. Civ. App. 1981)

- *Whitely v. Food Giant, Inc.*, 721 So. 2d 207, 209 (Ala. Civ. App. 1998)
- *Dinmark v. Farrier*, 510 So. 2d 819 (Ala. 1987)
- *Ortega v. Brock*, 501 F. Supp. 2d 1337, 1339 (M.D. Ala. 2007)
- *SouthTrust Bank v. Jones, Morrison, Womack & Dearing, P.C.*, 939 So. 2d 885, 903 (Ala. Civ. App. 2005)
- *Wood v. Keesler*, 323 F.3d 872, 881-82 (11th Cir. 2003)

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