

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, LOUISVILLE DIVISION

Riquel Logan v. Sheriff Ramon Pineiroa, et al.

Civil Action No. 3:25-CV-417-CHB (W.D. Ky. May 8, 2026) · No. 3:25-CV-417-CHB · Decided May 8, 2026

SUMMARY

The United States District Court for the Western District of Kentucky considers Defendants’ Rule 12(b)(6) motion to dismiss claims arising from the seizure, retention, and alleged conversion of Plaintiff’s vehicle. The court denies dismissal of the federal claims on statute-of-limitations grounds and holds that the complaint adequately pleads a Monell claim based on ratification and tolerance or acquiescence theories. The excerpt ends before the court’s complete analysis and disposition of the remaining claims.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Louisville Division
WRITING FOR THE COURT	Claria Horn Boom
JURISDICTION	United States District Court for the Western District of Kentucky, Louisville Division
DECIDED	May 8, 2026
DOCKET	3:25-CV-417-CHB
DISPOSITION	other
PROCEDURAL POSTURE	Defendants Sheriff Ramon Pineiroa and Deputy Chief Brandon Bryan moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Plaintiff's amended complaint. The court granted the motion as to the § 1983 failure-to-train-and-supervise claim and denied it in all other respects.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true, views the complaint in the light most favorable to the plaintiff, draws reasonable inferences in the plaintiff's favor, and asks whether the complaint contains sufficient factual matter to state a claim that is plausible on its face. A statute-of-limitations defense may support dismissal at the pleading stage only when the allegations affirmatively show that the claim is time-barred.

TOPICS

motions to dismiss

section 1983

municipal liability

statute of limitations

conversion

PRACTICE AREAS

civil procedure

civil rights

constitutional law

municipal liability

property torts

QUESTIONS PRESENTED

1. Whether the complaint's § 1983 claims were affirmatively shown to be barred by Kentucky's one-year statute of limitations.
2. Whether the complaint adequately pleaded a Monell claim based on ratification and tolerance or acquiescence by the Nelson County Sheriff's Department.
3. Whether the § 1983 claims for continuing trespass and wrongful taking or conversion adequately alleged violations of federal constitutional rights rather than merely state-law torts.
4. Whether the § 1983 failure-to-train-and-supervise claim was adequately pleaded under either a Monell theory or an individual-capacity supervisory-liability theory.
5. Whether the Kentucky claims for negligent trespass, conversion, and intentional trespass to chattels were adequately pleaded or barred at the motion-to-dismiss stage.

HOLDINGS

1. Dismissal on statute-of-limitations grounds was improper because the amended complaint did not affirmatively show that the claims were time-barred. The allegations of later acts, including the 2024 demand for \$17,000 and the 2025 title-related conduct, likely supported application of the continuing-violation doctrine at the pleading stage.
2. The complaint adequately pleaded a Monell claim against the municipality, as asserted through Sheriff Pineiroa in his official capacity, based on ratification and/or a custom of tolerance or acquiescence to unconstitutional conduct.
3. Counts II and III adequately alleged § 1983 claims based on asserted Fourth and Fourteenth Amendment violations and were not subject to dismissal merely because they used state-law property terminology such as trespass, wrongful taking, or conversion.
4. Count IV failed to state a claim and was dismissed. The official-capacity Monell theory did not allege facts tying prior unconstitutional conduct to deficient training or supervision, and the individual-capacity supervisory-liability theory was inadequately pleaded and apparently abandoned.
5. The Kentucky property claims survived the motion to dismiss. The court declined to dismiss the negligent-trespass and conversion claims as untimely, and the complaint adequately alleged the intent required for intentional trespass to chattels.

KEY QUOTATIONS

“To survive a Rule 12(b)(6) motion to dismiss, “a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’” (Section II)

“Because the allegations in the Amended Complaint do not “affirmatively show” that Plaintiff’s § 1983 claims are time-barred, the Court will deny the Motion to Dismiss to the extent it argues Counts I, II, III, and IV are untimely.” (Section III(A)(2))

“In the present case, Plaintiff has failed to allege sufficient facts to support these demanding requirements.” (Section III(A)(5))

FACTUAL BACKGROUND

Plaintiff alleged that Defendants seized her 2018 Nissan Altima in June 2020 while executing a criminal warrant unrelated to her, stored it as evidence, refused requests for its return, and later demanded \$17,000 for its return. She further alleged that in 2025 she learned Defendants were using the vehicle and had transferred title to themselves or the Sheriff’s Office. The complaint asserted federal claims under 42 U.S.C. § 1983, including Monell liability and Fourth and Fourteenth Amendment violations, along with Kentucky claims for trespass, conversion, and related property torts.

PROCEDURAL HISTORY

Plaintiff filed the action in Nelson Circuit Court on June 16, 2025. Defendants removed it to the Western District of Kentucky on July 7, 2025. After Plaintiff filed an amended complaint, the court denied the original motion to dismiss as moot, and Defendants filed the motion addressed in this opinion. The court also obtained status reports concerning related state criminal proceedings, which had been dismissed as to Pineiroa and resolved by plea agreement as to Bryan; the charges relating to Plaintiff’s vehicle were dismissed.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-57, 570 (2007)
- Gavitt v. Born, 835 F.3d 623, 639-40 (6th Cir. 2016)
- Jelovsek v. Bredesen, 545 F.3d 431, 434 (6th Cir. 2008)
- Davis v. 36th District Court, No. 2:20-CV-12145, 2021 WL 2402083, at *4 (E.D. Mich. June 11, 2021)
- Baker v. Bean, No. 5:24-CV-1-BJB, 2025 WL 2323953, at *3 (W.D. Ky. Aug. 12, 2025)
- United Food & Com. Workers Loc. 1099 v. City of Sidney, 364 F.3d 738, 752 (6th Cir. 2004)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658, 690 n.55, 694 (1978)
- Barton v. Whitley County, No. 6:24-CV-145-CHB, 2025 WL 1646258, at *3 (E.D. Ky. June 10, 2025)
- Kentucky v. Graham, 473 U.S. 159, 169 (1985)

- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Cataldo v. U.S. Steel Corp., 676 F.3d 542, 547 (6th Cir. 2012)
- Wallace v. Kato, 549 U.S. 384, 388 (2007)
- Cox v. City of Jackson, 811 F. App'x 284, 288 (6th Cir. 2020)
- Hall v. Spencer County, Ky., 583 F.3d 930, 933 (6th Cir. 2009)
- Roberson v. Tennessee, 399 F.3d 792, 794 (6th Cir. 2005)
- Johnson v. Memphis Light Gas & Water Division, 777 F.3d 838, 843 (6th Cir. 2015)
- Brown v. Louisville-Jefferson County Metro Government, 135 F.4th 1022, 1034-35 (6th Cir. 2025)
- Helphenstine v. Lewis County, 60 F.4th 305, 321, 323 (6th Cir. 2023)
- Burgess v. Fischer, 735 F.3d 462, 478-79 (6th Cir. 2013)
- Buehner v. City of Cleveland, 788 F. Supp. 3d 827, 885, 890 (N.D. Ohio 2025)
- Jackson v. City of Cleveland, 622 F. Supp. 3d 636, 641, 644 (N.D. Ohio 2022)
- Gomez v. City of Memphis, Nos. 21-5473/5644, 2023 WL 7287100, at *1 (6th Cir. Aug. 4, 2023)
- Feliciano v. City of Cleveland, 988 F.2d 649, 656 (6th Cir. 1993)
- Wright v. City of Euclid, 962 F.3d 852, 882 (6th Cir. 2020)
- Wallace v. Coffee County, 852 F. App'x 871, 876 (6th Cir. 2021)
- Farmer v. United Parcel Service Co., No. 3:24-CV-460-CHB, 2025 WL 278630, at *3 (W.D. Ky. Jan. 23, 2025)
- Bates v. Green Farms Condominium Association, 958 F.3d 470, 484 (6th Cir. 2020)
- SRVR, LLC v. Neidoni, No. 3:18-CV-050-CHB, 2020 WL 201052, at *6 (W.D. Ky. Jan. 13, 2020)
- Members Heritage Credit Union v. New York Marine & General Insurance Co., No. 5:21-CV-207-CHB, 2023 WL 4876383, at *13 (E.D. Ky. July 31, 2023)
- Brown v. Astrue, No. 09-387-HRW, 2010 WL 4878866, at *3 (E.D. Ky. Nov. 24, 2010)
- Gambrel v. Knox County, 25 F.4th 391, 408 (6th Cir. 2022)
- Connick v. Thompson, 563 U.S. 51, 61, 70 (2011)
- Crawford v. Tilley, 15 F.4th 752, 761-62 (6th Cir. 2021)
- Peatross v. City of Memphis, 818 F.3d 233, 242, 245 (6th Cir. 2016)
- Shehee v. Luttrell, 199 F.3d 295, 299 (6th Cir. 1999)
- Huelett v. Louisville Paving Co., Inc., No. 3:23-CV-00420, 2025 WL 552686, at *12 (W.D. Ky. Feb. 19, 2025)
- Madison Capital Co., LLC v. S & S Salvage, LLC, 765 F. Supp. 2d 923, 935 (W.D. Ky. 2011), aff'd, 507 F. App'x 542 (6th Cir. 2012)
- Stanley v. Knuckles, No. 2016-CR-1290-MR, 2017 WL 6398296, at *4 (Ky. Ct. App. Dec. 15, 2017)
- Ladd v. Nashville Booting, LLC, No. 3:20-CV-00626, 2021 WL 3363448, at *9-10 (M.D. Tenn. Aug. 3, 2021)
- Greyhawk, LLC v. Indiana/Kentucky Regional Council of Carpenters, Local Union No. 64, No. 3:07-CV-727-S, 2009 WL 5169821, at *7 (W.D. Ky. Dec. 20, 2009)

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