

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Shan Valencia Thomas v. Stanislaus County, Kyle Christianson, Eric
Garcia, and Does 1-10, inclusive

No. 2:25-cv-02113 WBS CSK (E.D. Cal. Jan. 6, 2026) · No. No. 2:25-cv-02113 WBS CSK · Decided January 6,
2026

SUMMARY

The United States District Court for the Eastern District of California denied defendants’ motion to dismiss Shan Valencia Thomas’s First Amended Complaint arising from alleged police-dog and other excessive force during his arrest. The court held that Thomas’s nolo contendere plea to California Penal Code section 69 did not support dismissal under Heck v. Humphrey in light of King v. Villegas. The court also found that Thomas adequately pleaded municipal liability under Monell and supervisory liability under 42 U.S.C. § 1983.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	William B. Shubb
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 6, 2026
DOCKET	No. 2:25-cv-02113 WBS CSK
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss plaintiff's first amended complaint for failure to state a claim.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts the complaint's allegations as true, draws all reasonable inferences in the plaintiff's favor, and determines whether the complaint states a claim for relief that is plausible on its face.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; persuasive authority only
PARTIES	Shan Valencia Thomas v. Stanislaus County, Kyle Christianson, Eric Garcia, Does 1-10, inclusive

TOPICS

section 1983 police misconduct municipal liability motions to dismiss civil rights

PRACTICE AREAS

civil rights constitutional law police misconduct municipal liability civil procedure

QUESTIONS PRESENTED

1. Whether Thomas's § 1983 excessive-force claim was barred by *Heck v. Humphrey* because he had entered a nolo contendere plea to violating California Penal Code § 69.
2. Whether Thomas adequately pleaded a municipal-liability claim against Stanislaus County under a custom or policy theory.
3. Whether Thomas adequately pleaded supervisory liability under § 1983 against the Supervisor and Officer Does.

HOLDINGS

1. At the pleading stage, Thomas's nolo contendere plea and the facts stipulated to in connection with it could not be relied on to establish that he committed a violation of California Penal Code § 69; therefore, there was no plausible basis to conclude that his excessive-force claim was barred by *Heck*.
2. Thomas adequately pleaded a Monell claim because he alleged multiple sufficiently similar incidents in which Stanislaus County deputies allegedly used excessive force to punish subdued or restrained arrestees, together with allegations that the incidents occurred without discipline, investigation, or retraining.
3. Thomas adequately stated a supervisory-liability claim because he alleged both a sufficient causal connection between the supervisors' wrongful conduct and the excessive-force violation and personal participation in the constitutional deprivation.

KEY QUOTATIONS

“a judgment in favor of [him] would necessarily imply the invalidity of his conviction or sentence.” (at 2)

“[Federal] Rule [of Evidence] 410(a) bars admission of a nolo contendere plea to show that a § 1983 plaintiff committed the crimes to which he pleaded nolo contendere.” (at 2)

“A government entity may not be held liable under 42 U.S.C. § 1983, unless a policy, practice, or custom of the entity can be shown to be a moving force behind a violation of constitutional rights.” (at 6)

“At the pleading stage, plaintiff need not prove the existence of such a custom” (at 6)

“A defendant may be held liable as a supervisor under § 1983 if there exists either (1) his or her personal involvement in the constitutional deprivation, or (2) a sufficient causal connection between the supervisor's wrongful conduct and the constitutional violation.” (at 10)

FACTUAL BACKGROUND

On or about May 24, 2022, Stanislaus County Sheriff's Office deputies located Thomas behind a fence while searching for him. According to the complaint, Deputy Christianson tore down the fence, Deputy Garcia commanded a police dog to attack Thomas, and deputies continued restraining him and permitting the dog to attack after Thomas raised his hands in surrender; Thomas suffered severe leg injuries and a broken arm requiring surgery. Thomas later entered a nolo contendere plea to violating California Penal Code § 69. He alleged that the defendants' conduct violated the Fourth Amendment and that Stanislaus County maintained a custom or policy of using excessive force against subdued or restrained arrestees.

PROCEDURAL HISTORY

Thomas brought claims under 42 U.S.C. § 1983 arising from alleged police use of excessive force, including claims against individual deputies, Stanislaus County, and supervisory defendants. Defendants moved to dismiss the first amended complaint. The district court denied the motion as to the excessive-force, Monell, and supervisory-liability claims.

DISPOSITION

other

CASES CITED

- Heck v. Humphrey, 512 U.S. 477, 487 (1994)
- King v. Villegas, 156 F.4th 979, 984-85 (9th Cir. 2025)
- People v. West, 3 Cal. 3d 595 (Cal. 1970)
- Warden v. B. Cowan, No. 2:19-cv-00431 TLN AC P, 2025 WL 3563222, at *8 (E.D. Cal. Dec. 12, 2025)
- Nat'l Lab. Rels. Bd. v. Int'l Ass'n of Bridge, Structural, Ornamental, & Reinforcing Iron Workers, Loc. 229, AFL-CIO, 974 F.3d 1106, 1117 (9th Cir. 2020)
- Quinto-Collins v. City of Antioch, No. 21-cv-06094 VC, 2022 WL 18574, at *2 (N.D. Cal. Jan. 3, 2022)
- Dougherty v. City of Covina, 654 F.3d 892, 900 (9th Cir. 2011)
- Monell v. Dep't of Soc. Servs. of the City of New York, 436 U.S. 658, 694 (1978)
- Plumeau v. Sch. Dist. No. 40 Cnty. of Yamhill, 130 F.3d 432, 438 (9th Cir. 1997)
- Gonzalez v. Cnty. of Merced, 289 F. Supp. 3d 1094, 1098-99 (E.D. Cal. 2017)
- Doe v. Cnty. of San Joaquin, No. 2:24-cv-00899 WBS CKD, 2024 WL 3697555, at *4 (E.D. Cal. Aug. 7, 2024)
- Trevino v. Gates, 99 F.3d 911, 918 (9th Cir. 1996)
- French v. City of Los Angeles, No. ED-cv-20416 JGB SHKx, 2021 WL 6752229, at *5 (C.D. Cal. Jan. 8, 2021)
- J.M. by & Through Rodriguez v. Cnty. of Stanislaus, No. 1:18-cv-01034 LJO SAB, 2018 WL 5879725, at *6 (E.D. Cal. Nov. 7, 2018)
- Larez v. City of Los Angeles, 946 F.2d 630, 646 (9th Cir. 1991)
- Starr v. Baca, 652 F.3d 1202, 1207-08 (9th Cir. 2011)
- Taylor v. List, 880 F.2d 1040, 1045 (9th Cir. 1989)

- Dubner v. City & Cnty. of San Francisco, 266 F.3d 959, 968 (9th Cir. 2001)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-cal/2026/shan-valencia-thomas-v-stanislaus-county-kyle-christianson-3cru49f9>