

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Lawrence Reddick v. Officer Campbell, et al.

Reddick v. Campbell · No. 5:25-cv-02390-FLA-SSC · Decided December 2, 2025

SUMMARY

The United States District Court for the Central District of California screens Lawrence Reddick’s in forma pauperis civil-rights complaint against Officer Campbell and the San Bernardino Police Department. The court identifies potential Heck v. Humphrey, Rule 8, and municipal-liability deficiencies and orders Reddick to show cause by January 5, 2026, why the action should not be dismissed. The court permits voluntary dismissal or filing a first amended complaint curing the identified deficiencies.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Stephanie S. Christensen
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 2, 2025
DOCKET	5:25-cv-02390-FLA-SSC
DISPOSITION	other
PROCEDURAL POSTURE	The court issued an order to show cause after screening Plaintiff's in forma pauperis civil-rights complaint under 28 U.S.C. § 1915(e)(2)(B). The court identified potentially curable deficiencies and permitted Plaintiff either to voluntarily dismiss the action or file an amended complaint.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis action that is frivolous, malicious, fails to state a claim, or seeks relief from an immune defendant. Review for failure to state a claim under § 1915(e)(2)(B)(ii) applies the same standard as Rule 12(b)(6): the court accepts well-pleaded factual allegations as true and draws reasonable inferences in the plaintiff's favor, but does not accept conclusory allegations, unwarranted factual deductions, or unreasonable inferences.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Lawrence Reddick v. Officer Campbell, San Bernardino Police Department

TOPICS

section 1983 civil procedure pleadings municipal liability federal habeas corpus

PRACTICE AREAS

civil rights civil procedure municipal liability prisoner civil rights post-conviction relief

QUESTIONS PRESENTED

1. Whether the complaint was potentially barred by *Heck v. Humphrey* because the requested relief and allegations necessarily implicated the validity of an ongoing criminal prosecution or conviction.
2. Whether the complaint stated a claim under 42 U.S.C. § 1983 and complied with Federal Rule of Civil Procedure 8(a)'s short-and-plain-statement requirement.
3. Whether the complaint adequately alleged municipal liability against the San Bernardino Police Department or an official-capacity claim against Officer Campbell under *Monell*.

HOLDINGS

1. A § 1983 claim that necessarily implies the invalidity of a conviction or sentence may not proceed unless the conviction or sentence has been invalidated through the recognized appellate, executive, state, or federal habeas mechanisms. The court further stated that *Heck* applies to claims seeking monetary or equitable relief. Because the complaint appeared to challenge charges for which Plaintiff was currently being prosecuted, the action appeared to be *Heck*-barred.
2. The complaint failed to comply with Rule 8 because it did not identify the constitutional amendments allegedly violated and contained only cursory allegations concerning Defendants' conduct. A § 1983 complaint must provide fair notice of the particular claim, the defendant being sued, the theory of liability, and the relief sought.
3. A municipality cannot be held liable under § 1983 on a respondeat superior theory. The plaintiff must allege that the constitutional deprivation resulted from a municipal policy or custom, including through a qualifying act of commission, omission, or ratification. Reddick alleged no policy, custom, or policy-related decision and therefore failed to state a municipal-liability claim against the police department.

KEY QUOTATIONS

“The Court is required to screen any civil action in which a plaintiff proceeds in forma pauperis and dismiss any claims that are frivolous, malicious, fail to state a claim upon which relief can be granted, or seek monetary relief from a defendant who is immune from such relief.”

“To state a claim for municipal liability, a plaintiff must show how the alleged constitutional deprivation resulted from a municipal policy or custom rather than the independent acts of individual municipal employees.”

“Known as Monell liability, a plaintiff can establish local government liability in one of three ways.”

FACTUAL BACKGROUND

Reddick alleged that Officer Campbell and an unidentified fellow officer arrested him to conceal a robbery and fraudulently used his personal and business accounts. The complaint sought dismissal and erasure of his criminal case and records, as well as \$10 million in damages. The court understood the complaint to indicate that Reddick was currently being prosecuted on the charges he claimed were improperly brought.

PROCEDURAL HISTORY

Reddick filed a § 1983 action against the San Bernardino Police Department and Officer Campbell in both individual and official capacities and applied to proceed in forma pauperis. The court screened the complaint, found that the allegations potentially implicated the Heck bar, failed to satisfy Rule 8, and did not plead a basis for municipal liability. Rather than immediately dismissing the action, the court ordered Plaintiff to show cause by January 5, 2026, why dismissal should not occur and allowed amendment.

DISPOSITION

other

CASES CITED

- Watison v. Carter, 668 F.3d 1108 (9th Cir. 2012)
- Mendiondo v. Centinela Hospital Medical Center, 521 F.3d 1097 (9th Cir. 2008)
- Sprewell v. Golden State Warriors, 266 F.3d 979 (9th Cir. 2001)
- Wilkinson v. Dotson, 544 U.S. 74 (2005)
- Heck v. Humphrey, 512 U.S. 477 (1994)
- Nonnette v. Small, 316 F.3d 872 (9th Cir. 2003)
- Edwards v. Balisok, 520 U.S. 641 (1997)
- Whitaker v. Garcetti, 486 F.3d 572 (9th Cir. 2007)
- Thai v. County of Los Angeles, 127 F.4th 1254 (9th Cir. 2025)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- McHenry v. Renne, 84 F.3d 1172 (9th Cir. 1996)
- Exmundo v. Kane, 553 F. App'x 742 (9th Cir. 2014)
- Board of County Commissioners v. Brown, 520 U.S. 397 (1997)
- Kirkpatrick v. County of Washoe, 843 F.3d 784 (9th Cir. 2016) (en banc)
- Moodian v. County of Alameda Social Services Agency, 206 F. Supp. 2d 1030 (N.D. Cal. 2002)
- Monell v. Department of Social Services, 436 U.S. 658 (1978)
- Clouthier v. County of Contra Costa, 591 F.3d 1232 (9th Cir. 2010)
- Castro v. County of Los Angeles, 833 F.3d 1060 (9th Cir. 2016) (en banc)
- Kentucky v. Graham, 473 U.S. 159 (1985)

- Vance v. County of Santa Clara, 928 F. Supp. 993 (N.D. Cal. 1996)
- Garmon v. County of Los Angeles, 828 F.3d 837 (9th Cir. 2016)

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