

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
OKLAHOMA

Dalton Gage Hill, Administrator and Personal Representative of the
Estate of Jeffery Allen Hill, deceased v. Oklahoma County Criminal
Justice Authority, et al.

Hill · No. CIV-24-1298-D · Decided December 3, 2025

SUMMARY

The United States District Court for the Western District of Oklahoma adopted a magistrate judge’s Report and Recommendation and granted the Board of County Commissioners of Oklahoma County’s motion to dismiss. The court held that the amended complaint did not plausibly allege a BOCC policy or custom, a causal connection to the alleged constitutional injury, or systemic failures sufficient to support municipal liability under 42 U.S.C. § 1983. The claims against BOCC were dismissed without prejudice but without leave to amend.

CASE DETAILS

COURT	United States District Court for the Western District of Oklahoma
WRITING FOR THE COURT	Timothy D. DeGiusti
JURISDICTION	United States District Court for the Western District of Oklahoma
DECIDED	December 3, 2025
DOCKET	CIV-24-1298-D
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending dismissal of claims against the Board of County Commissioners of Oklahoma County under Federal Rule of Civil Procedure 12(b)(6). The district court adopted the recommendation and granted the motion to dismiss without prejudice and without leave to amend.
STANDARD OF REVIEW	The court reviewed the magistrate judge's Report and Recommendation after Plaintiff filed an objection and considered the motion to dismiss on the merits under the applicable pleading standard.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

section 1983

municipal liability

motions to dismiss

pleadings

civil procedure

PRACTICE AREAS

civil rights

constitutional law

municipal liability

federal civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged a policy or custom of the Board of County Commissioners sufficient to support municipal liability under 42 U.S.C. § 1983.
2. Whether the amended complaint plausibly alleged a direct causal link between a Board policy or custom and the alleged constitutional injury.
3. Whether allegations of policies against other defendants, including the Oklahoma County Criminal Justice Authority, could be treated as allegations against the Board of County Commissioners.
4. Whether Plaintiff stated state-law tort or Oklahoma constitutional claims against the Board.

HOLDINGS

1. The amended complaint failed to specifically allege the existence of a pertinent Board of County Commissioners policy or custom and therefore did not state a plausible § 1983 municipal-liability claim against the Board.
2. The amended complaint failed to allege a direct causal link between any Board policy or custom and the alleged constitutional injury.
3. Allegations concerning the Oklahoma County Criminal Justice Authority or jail administrators could not be imputed to the Board merely because the Board funded or oversaw the Authority.
4. The amended complaint did not assert state-law tort claims or claims under the Oklahoma Constitution against the Board of County Commissioners.

KEY QUOTATIONS

“Upon review of the Amended Complaint, the Court agrees with the magistrate judge’s conclusion that Plaintiff failed to specifically allege the existence of a pertinent BOCC policy. Further, the allegations asserted against other defendants do not state a plausible § 1983 claim against BOCC.” (Doc. No. 121, at 6-7)

“For these reasons, the Court ADOPTS the Report and Recommendation [Doc. No. 121] in its entirety, and BOCC’s Motion to Dismiss [Doc. No. 54] is GRANTED.” (Doc. No. 121, at 8)

FACTUAL BACKGROUND

Jeffery Allen Hill was detained at the Oklahoma County Detention Center after pleading guilty in Oklahoma County District Court and receiving a life sentence. He complained repeatedly of severe wisdom-tooth pain, was prescribed penicillin despite a documented allergy, and allegedly did not receive timely dental treatment. He

later became unresponsive, required emergency surgery and ventilation, developed sepsis and multi-organ failure, and died. The complaint attributed the alleged constitutional injuries to policies, customs, funding, and supervision involving the Oklahoma County Criminal Justice Authority and the Board of County Commissioners.

PROCEDURAL HISTORY

Plaintiff filed an amended § 1983 complaint arising from Jeffery Allen Hill's death after alleged inadequate dental and medical care at the Oklahoma County Detention Center. The Board of County Commissioners moved to dismiss. After Plaintiff's response was stricken and he failed to timely respond to the motion as ordered, the magistrate judge issued reports and recommendations. The district court declined to deem the motion confessed, re-referred it for consideration on the merits, adopted the magistrate judge's later recommendation, and dismissed the claims against the Board without prejudice and without leave to amend.

DISPOSITION

dismissed

CASES CITED

- Monell v. Department of Social Services, 436 U.S. 658, 691-92, 694 (1978)
- Prince v. Sheriff of Carter County, 28 F.4th 1033, 1049 (10th Cir. 2022)
- Cox v. Glanz, 800 F.3d 1231, 1254 (10th Cir. 2015)
- Schneider v. City of Grand Junction Police Department, 717 F.3d 760, 769 (10th Cir. 2013)
- Robbins v. Oklahoma, 519 F.3d 1242, 1250 (10th Cir. 2008)
- Lucas v. Turn Key Health Clinics, LLC, 58 F.4th 1127, 1144 (10th Cir. 2023)
- Chichakli v. Samuels, Case No. CIV-15-687-D, 2016 WL 2743542, at *4 (W.D. Okla. May 11, 2016)
- Burnett v. Mortgage Electronic Registration Systems, Inc., 706 F.3d 1231, 1238 n.4 (10th Cir. 2013)
- Brooks v. Mentor Worldwide LLC, 985 F.3d 1272, 1283 (10th Cir. 2021)
- Hall v. Witteman, 584 F.3d 859, 868 (10th Cir. 2009)