

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, HOUSTON DIVISION

Raven Lillie v. Hector Aaron Ruiz, et al.

Lillie · No. Civil Action No. 4:21-CV-03740 · Decided March 16, 2026

SUMMARY

The United States District Court for the Southern District of Texas granted the City of Arcola's motion for summary judgment in Raven Lillie's 42 U.S.C. § 1983 action arising from a sexual assault allegedly committed by a city police officer. The court held that Lillie failed to present evidence establishing the required direct causal link between the City's alleged failures to train, supervise, or adopt recording policies and the constitutional violations, and dismissed her claims with prejudice.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Houston Division
JURISDICTION	United States District Court for the Southern District of Texas, Houston Division
DECIDED	March 16, 2026
DOCKET	Civil Action No. 4:21-CV-03740
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983 against the City of Arcola based on alleged Fourth and Fourteenth Amendment violations. After the court dismissed some claims, the City moved for summary judgment on the remaining § 1983 claims.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The nonmovant must present competent summary-judgment evidence supporting the essential elements of the claim.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

- summary judgment
- section 1983
- municipal liability
- police misconduct
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the City of Arcola was entitled to summary judgment on Lillie's § 1983 municipal-liability claims.
2. Whether Lillie presented sufficient evidence of a direct causal link between the City's alleged failure to train, supervise, or require body-worn-camera use and Ruiz's sexual assault of Lillie.

HOLDINGS

1. The City was entitled to summary judgment because Lillie failed to present evidence creating a genuine dispute that any alleged City policy or failure was the moving force behind the constitutional violation.
2. They did not create a genuine issue of material fact because generalized assertions that inadequate supervision or recording protocols could permit misconduct were insufficient without evidence connecting the alleged failures to Ruiz's assault.

KEY QUOTATIONS

“Section 1983 ‘is not itself a source of substantive rights,’ but merely provides ‘a method for vindicating federal rights elsewhere conferred.’” (3/7)

“Municipal liability under section 1983 requires proof of three elements: a policymaker; an official policy; and a violation of constitutional rights whose ‘moving force’ is the policy or custom.” (4/7)

“This argument, of course, is not particular to the alleged failures or harms in this matter and is insufficient to support Monell liability.” (5/7)

“The Court finds that the relationship between the City’s failures and Ruiz’s violation of Lillie’s constitutional rights is too attenuated to create a fact question on Monell liability.” (6/7)

FACTUAL BACKGROUND

Police Officer Hector Aaron Ruiz stopped Lillie for a traffic violation, threatened to take her to jail if she did not follow him to an abandoned area, and then forced her to perform a sex act. Lillie reported the assault later that day. She sued the City of Arcola under § 1983, alleging municipal liability based on failure to train, failure to supervise, and failure to adopt an appropriate policy concerning video and audio recording.

PROCEDURAL HISTORY

Lillie initially asserted claims against the City for sexual assault, battery, false imprisonment, and constitutional violations. The court granted in part and denied in part the City's motion to dismiss, leaving only the § 1983 claims. The City moved for summary judgment; after granting Lillie additional time for discovery, the court found the motion ripe and granted it, dismissing Lillie's claims against the City with prejudice.

DISPOSITION

dismissed

CASES CITED

- Estate of Miranda v. Navistar, Inc., 23 F.4th 500, 503 (5th Cir.)
- Cephus v. Texas Health & Human Services Commission, 146 F. Supp. 3d 818, 826 (S.D. Tex.)
- Graham v. Connor, 490 U.S. 386, 393-394 (1989)
- Baker v. McCollan, 443 U.S. 137, 144 (1979)
- Victoria W. v. Larpenter, 369 F.3d 475, 482 (5th Cir.)
- Bush v. Viterna, 795 F.2d 1203, 1209 (5th Cir.)
- Gobert v. Caldwell, 463 F.3d 339 (5th Cir.)
- Piotrowski v. City of Houston, 237 F.3d 567, 578, 580 (5th Cir.)
- Monell v. Department of Social Services, 436 U.S. 658, 694 (1978)
- James v. Harris County, 577 F.3d 612, 617 (5th Cir.)
- Johnson v. Deep East Texas Regional Narcotics Trafficking Task Force, 379 F.3d 293, 310 (5th Cir.)
- Fraire v. City of Arlington, 957 F.2d 1268, 1281-1282 (5th Cir.)
- City of Canton v. Harris, 489 U.S. 378, 391 (1989)