

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

Ashton Lamar Bell v. Constable Reynosa, et al.

Bell v. Constable Reynosa · No. 4:25-3357 · Decided November 24, 2025

SUMMARY

The United States District Court for the Southern District of Texas stayed and administratively closed Ashton Lamar Bell’s pro se 42 U.S.C. § 1983 action against Constable Reynosa and Constable Loucks. The court concluded that Bell’s claims concerning his detention and arrest could implicate the validity of his related state-court conviction and sentence, invoking Heck v. Humphrey and Wallace v. Kato. The court permitted Bell to seek reinstatement within 30 days after the criminal proceedings, including any appeal, conclude.

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	November 24, 2025
DOCKET	4:25-3357
DISPOSITION	other
PROCEDURAL POSTURE	Pro se detainee brought a 42 U.S.C. § 1983 civil-rights action against county constables arising from his detention and arrest. The district court conducted the screening required by the Prison Litigation Reform Act and stayed and administratively closed the action because the claims implicated the validity of a related state criminal conviction and sentence.
STANDARD OF REVIEW	PLRA screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b); failure-to-state-a-claim review applies the Rule 12(b)(6) standard, with pro se pleadings liberally construed and well-pleaded facts accepted as true.
PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion and order; generally nonprecedential outside the case.
PARTIES	Ashton Lamar Bell v. Constable Reynosa, Constable Loucks, et al.

TOPICS

section 1983 prisoners rights civil rights criminal procedure post-conviction relief

PRACTICE AREAS

civil rights criminal procedure prisoner litigation post-conviction relief

QUESTIONS PRESENTED

1. Whether Bell's § 1983 claims arising from his detention and arrest were barred by *Heck v. Humphrey* because success on the claims would imply the invalidity of his related conviction or sentence.
2. Whether the district court should stay and administratively close the civil-rights action pending resolution of the related criminal proceedings and any appeal.
3. What screening standard governed the pro se prisoner's complaint under the Prison Litigation Reform Act.

HOLDINGS

1. A § 1983 damages claim that bears a relationship to a conviction or sentence is not cognizable when a judgment for the plaintiff would necessarily imply the invalidity of that conviction or sentence, unless the conviction or sentence has already been invalidated.
2. When a detainee's civil-rights claims relate to rulings likely to be made in a pending criminal proceeding, the district court should stay the civil-rights case until the criminal proceeding, including any appeal, is resolved.
3. A district court must screen a prisoner's in forma pauperis complaint seeking relief from governmental defendants and may dismiss it as frivolous, for failure to state a claim, or because it seeks relief from an immune defendant; failure to state a claim is evaluated under the Rule 12(b)(6) standard, with liberal construction of pro se pleadings.

KEY QUOTATIONS

“The Supreme Court has held that a civil rights claim under 42 U.S.C. § 1983 that bears a relationship to a conviction or sentence is not cognizable unless the conviction or sentence has been invalidated.” (III)

“The Court therefore will stay and administratively close this case until the criminal proceedings against Bell in in Case No. 25-02-02124, including any future appeal, are resolved.” (III)

“Within 30 days after judgment is entered in the criminal proceedings against him, Bell may file a motion to reinstate this case.” (IV)

FACTUAL BACKGROUND

Bell alleged that Constable Loucks stopped him while he was walking along Interstate 45, searched him with his consent, and later handled and searched his bag with a canine during a traffic stop involving Bell and his parents. He claimed that Constables Loucks and Reynosa violated his Fourth and Fourteenth Amendment rights and

sought \$500,000 in damages. Public records showed that Bell pleaded guilty to a related drug charge and was sentenced to fifteen years in state prison.

PROCEDURAL HISTORY

Bell filed this civil-rights action while detained and proceeding in forma pauperis. During screening, the district court reviewed public records showing that Bell had pleaded guilty and received a fifteen-year sentence in the related state criminal case. The court concluded that *Heck v. Humphrey* barred claims implying the invalidity of that conviction or sentence, but, following *Wallace v. Kato*, stayed and administratively closed the case until the criminal proceedings, including any appeal, were resolved.

DISPOSITION

other

CASES CITED

- *Samford v. Dretke*, 562 F.3d 674, 678 (5th Cir. 2009)
- *Rogers v. Boatright*, 709 F.3d 403, 407 (5th Cir. 2013)
- *Newsome v. EEOC*, 301 F.3d 227, 231 (5th Cir. 2002)
- *Harrington v. State Farm Fire & Cas. Co.*, 563 F.3d 141, 147 (5th Cir. 2009)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007)
- *Patrick v. Wal-Mart, Inc.*, 681 F.3d 614, 617 (5th Cir. 2012)
- *Neitzke v. Williams*, 490 U.S. 319, 327 (1989)
- *Geiger v. Jowers*, 404 F.3d 371, 373 (5th Cir. 2005)
- *Pratt v. Harris Cty., Tex.*, 822 F.3d 174, 180 (5th Cir. 2016)
- *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994)
- *Clarke v. Stalder*, 154 F.3d 186, 189-91 (5th Cir. 1998) (en banc)
- *Wallace v. Kato*, 549 U.S. 384, 393-94 (2007)
- *Hopkins v. Ogg*, 783 F. App'x 350, 355 & n.20 (5th Cir. 2019)
- *Mackey v. Dickson*, 47 F.3d 744, 746 (5th Cir. 1995)
- *Johnson v. McElveen*, 101 F.3d 423, 424 (5th Cir. 1996)

OPINION

IN THE UNITED STATES DISTRICT COURT November 25, 2025 FOR THE SOUTHERN DISTRICT OF TEXAS Nathan Ochsner, Clerk HOUSTON DIVISION ASHTON LAMAR BELL, § # 439239, § § Plaintiff, § § VS. § CIVIL ACTION NO. 4:25-3357 § CONSTABLE REYNOSA, et al., § § Defendant. § MEMORANDUM OPINION AND ORDER STAYING

CASE Plaintiff Ashton Lamar Bell, a detainee in the Montgomery County Jail, proceeds pro se and in forma pauperis in this civil rights action.

After reviewing all of the pleadings as required by the Prisoner Litigation Reform Act (PLRA), the Court concludes that this case should be STAYED and ADMINISTRATIVELY CLOSED for the reasons that follow. I. BACKGROUND According to the Montgomery County Jail's public online records, Bell was arrested on February 10, 2025, and is charged with a drug offense in Case No. 25-02-02124.

See Montgomery County Jail Roster, available at <https://jailroster.mctx.org/> (last visited Nov. 20, 2025). The Montgomery County District Clerk's online records for Case No. 25-02- 02124 reflect that Bell pleaded guilty to the charges against him on October 9, 2025 and was sentenced to 15 years in the Texas Department of Criminal Justice. See District Clerk Court Records Inquiry, Montgomery County, available at <http://odyssey.mctx.org/unsecured/default.aspx> (last visited Nov.

20, 2025). The records do not reflect whether Bell waived his right to appeal. Bell claims in this lawsuit that Constable Reynosa and Constable Loucks, both K9 officers with the Montgomery County Constable, violated his civil rights in connection with his detention and arrest on February 10, 2025. He alleges that at approximately 11:00 a.m., while he was walking on the shoulder of I-45 in Conroe, Constable Loucks stopped him and stated that his location and behavior were suspicious; that Bell consented to a body search which yielded nothing illegal; and that Bell's parents came to pick him up.

He further states that, at approximately 12 noon, Constable Reynosa pulled over the vehicle in which Bell and his parents were traveling and stated that Bell's father had failed to signal a lane change. He claims that Constable Loucks then took Bell's bag out of the vehicle and threw it on the ground, "jerked the dog back" when it failed to alert to the bag, and ultimately "made [the dog] alert to drugs in [his] bag" (Dkt.

1, at 4-5). Bell alleges that the two defendants violated his Fourth and Fourteenth Amendment rights. As relief for his claims, he seeks \$500,000 in damages to cover lost wages, student loan payments, and other expenses (*id.* at 6). II. THE PLRA AND PRO SE PLEADINGS Because the plaintiff is a prisoner proceeding in forma pauperis and seeks redress from a governmental entity, the Court is required by the PLRA to dismiss the complaint at any time if it determines that the complaint is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief against a defendant who is immune from such relief.

28 U.S.C. § 1915(e)(2)(B); 28 U.S.C. § 1915A(b). A district court may dismiss a claim as frivolous if it lacks any arguable basis in law or fact. *Samford v. Dretke*, 562 F.3d 674, 678 (5th Cir. 2009). A claim lacks an arguable basis in law "if it is based on an indisputably meritless legal theory." *Rogers v. Boatright*, 709 F.3d 403, 407 (5th Cir. 2013) (cleaned up).

It lacks an arguable basis in fact “if, after providing the plaintiff the opportunity to present additional facts when necessary, the facts alleged are clearly baseless.” *Id.* (cleaned up). A dismissal for failure to state a claim is governed by the same standard as that for a motion under Rule 12(b)(6) of the Federal Rules of Civil Procedure. See *Newsome v. EEOC*, 301 F.3d 227, 231 (5th Cir.

2002). Under this standard, the Court “construes the complaint liberally in favor of the plaintiff,” “takes all facts pleaded in the complaint as true,” and considers whether “with every doubt resolved on [the plaintiff’s] behalf, the complaint states any valid claim for relief.” *Harrington v. State Farm Fire & Cas. Co.*, 563 F.3d 141, 147 (5th Cir. 2009) (cleaned up).

In reviewing the pleadings, the Court is mindful of the fact that the plaintiff proceeds pro se. Complaints filed by pro se litigants are entitled to liberal construction and, “however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers.” *Erickson v. Pardus*, 551 U.S. 89, 94 (2007) (cleaned up). Even under this lenient standard a pro se plaintiff must allege more than “‘labels and conclusions’ or a ‘formulaic recitation of the elements of a cause of action.’” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007)); see *Patrick v. Wal-Mart, Inc.*, 681 F.3d 614, 617 (5th Cir.

2012). “Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice.” *Iqbal*, 556 U.S. at 678. Additionally, regardless of how well-pleaded the factual allegations may be, they must demonstrate that the plaintiff is entitled to relief under a valid legal theory. See *Neitzke v. Williams*, 490 U.S. 319, 327 (1989); *Geiger v. Jowers*, 404 F.3d 371, 373 (5th Cir.

2005). III. DISCUSSION Bell brings his claims under 42 U.S.C. § 1983, which provides a vehicle for a claim against a person acting under color of state law for a constitutional violation. *Pratt v. Harris Cty., Tex.*, 822 F.3d 174, 180 (5th Cir. 2016). His allegations pertain to his detention and arrest on February 10, 2025, which is related to Case No. 25-02-02124, the criminal case in which he recently pleaded guilty.

The Supreme Court has held that a civil rights claim under 42 U.S.C. § 1983 that bears a relationship to a conviction or sentence is not cognizable unless the conviction or sentence has been invalidated. *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994).

To recover damages based on allegations of “harm caused by actions whose unlawfulness would render a conviction or sentence invalid,” a civil rights plaintiff must prove “that the conviction or sentence has been reversed on direct appeal, expunged by executive order, declared invalid by a state tribunal authorized to make such determinations, or called into question by a federal court’s issuance of a writ of habeas corpus [under] 28 U.S.C. § 2254.” *Id.* at 487.

If a judgment in favor of a civil rights plaintiff “would necessarily imply the invalidity of his conviction or sentence,” then the complaint “must be dismissed unless the plaintiff can demonstrate that the conviction or sentence has already been invalidated.” *Id.* Public court records do not reflect that Bell’s conviction or sentence in Case No. 25-02-02124 has been invalidated or otherwise set aside.

To the contrary, he recently pleaded guilty and was sentenced to 15 years in state prison. As stated above, public online records do not reflect whether he waived his right to appeal. Because his allegations in this lawsuit implicate the validity of the criminal charges against him, Heck precludes Bell’s claims until he can demonstrate that his conviction or sentence has been invalidated.

See *Clarke v. Stalder*, 154 F.3d 186, 189-91 (5th Cir. 1998) (en banc). The Supreme Court has explained that, if a pretrial detainee files civil rights claims related to rulings that will likely be made in a pending criminal proceeding, the best practice is for the district court to stay the civil rights case until the pending criminal case is resolved. *Wallace v. Kato*, 549 U.S. 384, 393-94 (2007); see *Hopkins v. Ogg*, 783 F. App’x 350, 355 & n.20 (5th Cir.

2019) (citing *Mackey v. Dickson*, 47 F.3d 744, 746 (5th Cir. 1995)). The Court therefore will stay and administratively close this case until the criminal proceedings against Bell in Case No. 25-02-02124, including any future appeal, are resolved. If Bell’s recent conviction is not invalidated, Heck will require dismissal of any claims in this lawsuit that would imply the invalidity of his conviction until the Heck conditions are met.

See *Johnson v. McElveen*, 101 F.3d 423, 424 (5th Cir. 1996) (explaining that claims barred by Heck are “dismissed with prejudice to their being asserted again until the Heck conditions are met”). If his conviction is invalidated, this lawsuit may proceed, absent some other bar to suit. See *Wallace*, 549 U.S. at 394. If Bell seeks to proceed with this suit after the criminal proceedings (including appeals) have concluded, he is instructed to file a motion to reinstate this case within 30 days of the state court judgment.

Failure to file a timely motion to reinstate could waive Bell’s opportunity to proceed with this civil action. IV. CONCLUSION For the reasons stated above the Court ORDERS that: 1. This civil action is STAYED and ADMINISTRATIVELY CLOSED until the Court enters an order lifting the stay. 2. All pending motions, if any, are DENIED as moot. 3. Within 30 days after judgment is entered in the criminal proceedings against him, Bell may file a motion to reinstate this case.

If Bell fails to a motion to reinstate within 30 days of the state court judgment, he may waive his opportunity to proceed with this lawsuit. The Clerk will provide a copy of this order to the parties. SIGNED at Houston, Texas, on November 24, 2025. UNITED STATES DISTRICT JUDGE 6/6

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