

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PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion and order; generally nonprecedential outside the case.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)