

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Steven Sencial v. Arthur Coll, et al.

Sencial · No. 2:24-cv-00874 · Decided June 9, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana dismissed with prejudice Steven Sencial’s 42 U.S.C. § 1983 claims against Officers Arthur Coll and A. Galvez under the Heck doctrine and for failure to state a claim. The court held that Sencial’s false-arrest, malicious-prosecution, and related claims would imply the invalidity of his guilty pleas to four counts of aggravated assault. The court declined supplemental jurisdiction over his state-law claims, dismissed them without prejudice, and denied the defendants’ motion to dismiss as moot.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Susie Morgan
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	June 9, 2026
DOCKET	2:24-cv-00874
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending dismissal of his federal claims against the officer defendants and dismissal without prejudice of his state-law claims. The district court conducted de novo review of the specifically challenged portions, adopted the Report and Recommendation, dismissed the federal claims with prejudice, declined supplemental jurisdiction over the state-law claims, and denied the defendants' Rule 12(b)(5) motion as moot.
STANDARD OF REVIEW	De novo review of portions of the magistrate judge's Report and Recommendation to which specific objections were made; clear-error or contrary-to-law review of the unobjected portions. The court applied the Rule 12(b)(6) standard to screening under 28 U.S.C. § 1915(e)(2)(B).
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only

PARTIES

Steven Sencial v. Arthur Coll, A. Galvez, S. Reina, Bautista Lopez, Rodriguez Cruz

TOPICS

section 1983 prisoners rights motions to dismiss civil procedure service of process

PRACTICE AREAS

civil rights civil procedure criminal procedure prisoner litigation remedies

QUESTIONS PRESENTED

1. Whether Sencial's § 1983 claims challenging the probable cause for his arrest, the validity of his prosecution, and alleged perjury were barred by Heck v. Humphrey despite his not having been convicted of aggravated assault with a firearm.
2. Whether the district court should decline supplemental jurisdiction over Sencial's remaining state-law claims after dismissing all federal claims.
3. Whether the defendants' Rule 12(b)(5) motion challenging service of process should be resolved on the merits.

HOLDINGS

1. The § 1983 claims were barred by Heck because success on Sencial's false-arrest, malicious-prosecution, false-testimony, and related claims would necessarily imply the invalidity of his arrest and criminal prosecution resulting in his four aggravated-assault convictions, and he had not shown that those convictions had been invalidated.
2. The alleged perjury claim would also fail because a police officer is absolutely immune from liability for testimony given as a witness in a criminal proceeding.
3. The court declined to exercise supplemental jurisdiction over Sencial's remaining state-law claims and dismissed them without prejudice because all claims within the court's original jurisdiction had been dismissed and the relevant statutory and discretionary factors favored declining jurisdiction.

KEY QUOTATIONS

“The Supreme Court held in Heck that when a state prisoner seeks damages in a [Section] 1983 suit, the district court must consider whether a judgment in favor of the plaintiff would necessarily imply the invalidity of his conviction or sentence; if it would, the complaint must be dismissed unless the plaintiff can demonstrate that the conviction or sentence has already been invalidated.” (at 6)

“After conducting a de novo review of the issues raised by Plaintiffs objections to Magistrate Judge Roby’s Report and Recommendations, the Court overrules those objections and adopts Magistrate Judge Roby’s Report and Recommendation.” (at 9)

FACTUAL BACKGROUND

Sencial alleged that Officers Arthur Coll and A. Galvez falsely reported and translated evidence, lacked probable cause to arrest him, and committed perjury during proceedings arising from his April 6, 2022 arrest. He asserted § 1983 claims for false arrest, malicious prosecution, false testimony, and related misconduct, as well as state-law claims. Although the criminal docket did not show a conviction for aggravated assault with a firearm, it showed that Sencial pleaded guilty to four counts of aggravated assault and received a six-month parish-prison sentence. He had not shown that those convictions had been reversed, expunged, declared invalid, or called into question.

PROCEDURAL HISTORY

Sencial filed an in forma pauperis action under 42 U.S.C. § 1983 and asserted related state-law claims arising from his arrest and criminal prosecution. The court previously dismissed claims against the private defendants and later lifted a stay concerning the claims against the officers. After the magistrate judge recommended dismissal under *Heck v. Humphrey*, Sencial objected, arguing that he had not been convicted of aggravated assault with a firearm. The district court overruled the objections, held that his guilty pleas to four counts of aggravated assault still made his constitutional claims Heck-barred, declined supplemental jurisdiction over the remaining state claims, and denied the service-of-process motion as moot.

DISPOSITION

other

CASES CITED

- *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994)
- *Wilkinson v. Dotson*, 544 U.S. 74, 81-82 (2005)
- *Mackey v. Dickson*, 47 F.3d 744, 746 (5th Cir. 1995)
- *Cormier v. Lafayette City*, 493 F. App'x 578, 583 (5th Cir. 2012) (per curiam)
- *Goldston v. City of Monroe ex rel. Monroe Police Dep't*, 621 F. App'x 274, 278 (5th Cir. 2015) (per curiam)
- *Wells v. Bonner*, 45 F.3d 90, 95 (5th Cir. 1995)
- *Magee v. Reed*, No. CV 14-1554, 2021 WL 411449, at *5 (E.D. La. Feb. 5, 2021)
- *Spann o/b/o Spann v. Bogalusa City Police Dep't*, No. CV 20-2780, 2021 WL 4318133, at *6 (E.D. La. Sept. 23, 2021)
- *Shaw v. Harris*, 116 F. App'x 499, 500 (5th Cir. 2004) (per curiam)
- *Wearry v. Foster*, 33 F.4th 260, 272 (5th Cir. 2022)
- *Batiste v. Island Records Inc.*, 179 F.3d 217, 227 (5th Cir. 1999)
- *McClelland v. Gronwaldt*, 155 F.3d 507, 519 (5th Cir. 1998)
- *Samford v. Dretke*, 562 F.3d 674, 678 (5th Cir. 2009)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009)
- *Cuvillier v. Taylor*, 503 F.3d 397, 401 (5th Cir. 2007)
- *Miller v. Stanmore*, 636 F.2d 986, 988 (5th Cir. 1981)

- Taylor v. Books A Million, Inc., 296 F.3d 376, 378 (5th Cir. 2002)
- S. Christian Leadership Conference v. Supreme Court of the State of La., 252 F.3d 781, 786 (5th Cir. 2001)
- Fernandez-Montes v. Allied Pilots Ass'n, 987 F.2d 278, 284 (5th Cir. 1993)
- Cutrer v. McMillan, 308 F. App'x 819, 820 (5th Cir. 2009) (per curiam)
- Clark v. Amoco Prod. Co., 794 F.2d 967, 970 (5th Cir. 1986)

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