

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

José González-Ortiz, et al. v. Puerto Rico Aqueduct and Sewer Authority, et al.

Gonzalez-Ortiz · No. Civil No. 23-1509 (RAM) · Decided April 16, 2026

SUMMARY

In this Opinion and Order, the United States District Court for the District of Puerto Rico grants summary judgment to the Puerto Rico Aqueduct and Sewer Authority and two individual defendants in a political-discrimination action arising from the plaintiff’s termination. The court analyzes the alleged workplace altercation, the collective bargaining agreement’s disciplinary procedures, the investigation and termination decision, and the plaintiff’s evidence of political animus. The document indicates that the court concluded the plaintiff failed to establish a triable claim of First Amendment political discrimination and addressed related qualified-immunity and Puerto Rico-law claims.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Raúl M. Arias-Marxuach
JURISDICTION	United States District Court for the District of Puerto Rico
DECIDED	April 16, 2026
DOCKET	Civil No. 23-1509 (RAM)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought First Amendment political-discrimination claims under 42 U.S.C. § 1983, along with claims under the Puerto Rico Constitution and Puerto Rico Civil Code. Defendants moved for summary judgment. The court granted both motions, dismissed the federal claims with prejudice, and declined supplemental jurisdiction over the Commonwealth claims, dismissing them without prejudice.
STANDARD OF REVIEW	Summary judgment is proper under Federal Rule of Civil Procedure 56(a) when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court must draw reasonable inferences for the nonmovant but may disregard conclusory allegations, unsupported speculation, and improbable inferences, and may not make credibility determinations or weigh evidence.
PRECEDENTIAL VALUE	Unknown

PARTIES

José González-Ortiz, et al. v. Puerto Rico Aqueduct and Sewer Authority, et al.

TOPICS

summary judgment

first amendment

section 1983

PRACTICE AREAS

employment law

civil rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the summary judgment record permitted a reasonable jury to find that González-Ortiz's termination was causally connected to political animus in violation of the First Amendment.
2. Whether the individual defendants could be liable under a cat's-paw theory based on alleged manipulation of information relied upon by the neutral termination decisionmaker.
3. Whether PRASA established under Mt. Healthy that it would have terminated González-Ortiz for nondiscriminatory reasons regardless of his political beliefs.
4. Whether the court should exercise supplemental jurisdiction over the remaining Puerto Rico constitutional and statutory claims after dismissing all federal claims.

HOLDINGS

1. Plaintiff failed to establish a prima facie political-discrimination claim because the summary judgment record did not show that the ultimate decisionmaker knew his political affiliation or acted with political animus, and plaintiff lacked evidence connecting the termination to politically discriminatory motivation.
2. Plaintiff could not proceed under a cat's-paw theory because he presented no competent evidence that the individual defendants manipulated information relied upon by López-Faría or that any such manipulation was a proximate cause of the termination.
3. Even assuming plaintiff established a prima facie political-discrimination claim, PRASA proved by a preponderance of the evidence that it would have terminated him for nondiscriminatory reasons regardless of his political beliefs.
4. The court declined to exercise supplemental jurisdiction over the remaining Puerto Rico constitutional and Civil Code claims after dismissing all claims within its original jurisdiction and dismissed those claims without prejudice.

KEY QUOTATIONS

“At bottom, this case rises or falls on a narrow issue: whether a reasonable jury could determine that Plaintiff’s termination was causally connected to López’s political animus. The Court rules that no reasonable jury could so conclude.” (V.A)

“On this record, PRASA has demonstrated by a preponderance of the evidence that it would have fired Plaintiff regardless of his desire to shun the pro-NPP activities allegedly favored by his coworkers.” (V.A.3)

FACTUAL BACKGROUND

José González-Ortiz worked as an IT technician for PRASA in a unionized position governed by a collective bargaining agreement. On June 10, 2022, he and supervisor Heriberto Vázquez-García engaged in a loud confrontation at PRASA headquarters; witnesses described aggressive and threatening behavior, although there was no direct physical contact. PRASA investigated the incident, issued a report recommending dismissal under the CBA's workplace-disorder rule, and Human Resources Director Waleska López-Farías adopted the recommendation after an informal hearing and terminated González-Ortiz. González-Ortiz claimed the termination was politically motivated because he declined to participate in activities associated with the New Progressive Party, but he admitted he had no evidence that López-Farías possessed discriminatory intent, and the record showed she lacked knowledge of his political affiliation.

PROCEDURAL HISTORY

Plaintiffs filed the complaint on October 10, 2023. The court previously dismissed all claims based on pre-termination harassment and other adverse employment actions as time-barred, dismissed all claims against Ángel Machado-Pellot, and allowed the termination-related claims to proceed. After denying partial reconsideration, the court considered separate summary judgment motions by PRASA and the remaining individual defendants. The court granted summary judgment on the First Amendment claims and dismissed the remaining Commonwealth-law claims without prejudice for lack of supplemental jurisdiction.

DISPOSITION

other

CASES CITED

- Thompson v. Coca-Cola Co., 522 F.3d 168, 175 (1st Cir. 2008)
- Albite v. Polytechnic University of Puerto Rico, Inc., 5 F. Supp. 3d 191, 195 (D.P.R. 2014)
- Sands v. Ridefilm Corp., 212 F.3d 657, 660-61 (1st Cir. 2000)
- Mercado-Reyes v. City of Angels, Inc., 320 F. Supp. 344, 347 (D.P.R. 2018)
- Bautista Cayman Asset Co. v. Terra II MC & P, Inc., 2020 WL 118592, at *6
- Méndez-Laboy v. Abbott Laboratories, 424 F.3d 35, 37 (1st Cir. 2005)
- Paul v. Murphy, 2020 WL 401129, at *3
- Johnson v. Duxbury, Massachusetts, 931 F.3d 102, 105 (1st Cir. 2019)
- Scott v. Harris, 550 U.S. 372, 379 (2007)
- Reeves v. Sanderson Plumbing Products, Inc., 530 U.S. 133, 135 (2000)
- Natal Pérez v. Oriental Bank & Trust, 291 F. Supp. 3d 215, 218-19 (D.P.R. 2018)
- Carreras v. Sajo, Garcia & Partners, 596 F.3d 25, 32 (1st Cir. 2010)
- Malave-Torres v. Cusido, 919 F. Supp. 2d 198, 207 (D.P.R. 2013)

- United States v. Rosario-Perez, 957 F.3d 277, 295 (1st Cir. 2020)
- Torres v. Commonwealth of Puerto Rico, 442 U.S. 465, 468-71 (1979)
- Ramirez-Nieves v. Municipality of Canovanas, 2017 WL 1034689, at *7
- Kusper v. Pontikes, 414 U.S. 51, 57-58 (1973)
- Ocasio-Hernández v. Fortuño-Burset, 640 F.3d 1, 13 (1st Cir. 2011)
- Rutan v. Republican Party of Illinois, 497 U.S. 62, 75-76 (1990)
- Welch v. Ciampa, 542 F.3d 927, 938-39 (1st Cir. 2008)
- Medina-Velázquez v. Hernández-Gregorat, 2015 WL 6829150, at *3
- Padilla-Garcia v. Guillermo Rodriguez, 212 F.3d 69, 74, 77 (1st Cir. 2000)
- Aviles-Martinez v. Monroig, 963 F.2d 2, 5 (1st Cir. 1992)
- LaRou v. Ridlon, 98 F.3d 659, 661 (1st Cir. 1996)
- Diaz-Baez v. Alicea-Vasallo, 22 F.4th 11, 19 (1st Cir. 2021)
- Kauffman v. Puerto Rico Telephone Co., 841 F.2d 1169, 1172 n.5 (1st Cir. 1988)
- Acevedo-Díaz v. Aponte, 1 F.3d 62, 67 (1st Cir. 1993)
- Rodríguez-Ríos v. Cordero, 138 F.3d 22, 24 (1st Cir. 1998)
- Ameen v. Amphenol Printed Circuits, Inc., 777 F.3d 63, 70 (1st Cir. 2015)
- Cariglia v. Hertz Equipment Rental Corp., 363 F.3d 77, 86-87 (1st Cir. 2004)
- Staub v. Proctor Hospital, 562 U.S. 411, 418-19 (2011)
- Benoit v. Technical Manufacturing Corp., 331 F.3d 166, 173 (1st Cir. 2003)
- Feliciano de la Cruz v. El Conquistador Resort & Country Club, 218 F.3d 1, 5 (1st Cir. 2000)
- Mesnick v. General Electric Co., 950 F.2d 816, 825 (1st Cir. 1991)
- Kearney v. Town of Wareham, 316 F.3d 18, 25 (1st Cir. 2002)
- Ashcroft v. al-Kidd, 563 U.S. 731, 735 (2011)
- Glik v. Cunniffe, 655 F.3d 78, 81 (1st Cir. 2011)
- Pike v. Budd, 133 F.4th 74, 91-92 (1st Cir. 2025)
- Pearson v. Callahan, 555 U.S. 223, 236 (2009)
- Marrero-Gutierrez v. Molina, 491 F.3d 1, 5 (1st Cir. 2007)