

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Mouzon v. Alameda County

Mouzon · No. 24-cv-01907-DMR (PR) · Decided October 3, 2025

SUMMARY

The United States District Court for the Northern District of California issued an order of service in Alfonso Mouzon’s § 1983 action against Alameda County. The court held that the amended complaint stated cognizable Fourteenth Amendment due process and Monell policy-based claims concerning conditions of confinement for civil detainees housed at the Alameda County Jail, and directed service and established case-management procedures.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Donna M. Ryu
JURISDICTION	United States District Court for the Northern District of California
DECIDED	October 3, 2025
DOCKET	24-cv-01907-DMR (PR)
DISPOSITION	other
PROCEDURAL POSTURE	Order of service following preliminary screening of a pro se amended civil-rights complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court applied the preliminary-screening standard under 28 U.S.C. § 1915A, liberally construed the pro se pleading, and assessed whether the amended complaint stated plausible claims under Federal Rule of Civil Procedure 8 and the pleading standards of Twombly and Iqbal.
PRECEDENTIAL VALUE	nonprecedential district-court order

TOPICS

- section 1983
- due process
- municipal liability
- prisoners rights
- pleadings

PRACTICE AREAS

- civil rights
- constitutional law
- civil procedure
- municipal law
- prisoner and civil-detainee conditions of confinement

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that conditions imposed on Mouzon as a civil detainee were punitive or otherwise violated the Due Process Clause.
2. Whether the amended complaint plausibly alleged municipal liability against Alameda County under Monell based on an unconstitutional policy, custom, or practice.
3. Whether the court should order service of the amended complaint after finding the claims cognizable under 28 U.S.C. § 1915A.

HOLDINGS

1. Liberally construed, the allegations were sufficient to state a cognizable claim under 42 U.S.C. § 1983 that the conditions imposed on Mouzon as a civil detainee denied him protections guaranteed by the Due Process Clause.
2. The amended complaint stated a cognizable policy-based municipal-liability claim against Alameda County under Monell.

KEY QUOTATIONS

“A civil detainee awaiting adjudication is entitled to conditions of confinement that are not punitive;” (II.B)

“Plaintiff states a due process and Monell claim against Defendant Alameda County.” (III)

FACTUAL BACKGROUND

Mouzon was a civil detainee held at Coalinga State Hospital and was housed at the Alameda County Jail from July through September 2021 while awaiting civil-commitment proceedings under California's Sexually Violent Predators Act. He alleged that Alameda County failed to treat sexually violent predator detainees differently from the general prison population and maintained deficient policies, customs, and practices governing their conditions of confinement. He claimed that these conditions violated the Fourteenth Amendment and that the challenged policy was the moving force behind the violation.

PROCEDURAL HISTORY

Alfonso Mouzon filed a pro se action under 42 U.S.C. § 1983 concerning conditions at the Alameda County Jail during his civil-detention proceedings. The amended complaint named Alameda County in its official capacity and sought injunctive relief and damages. After screening, the court found cognizable Fourteenth Amendment due-process and Monell municipal-liability claims and ordered service on Alameda County.

DISPOSITION

other

CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1990)

- Erickson v. Pardus, 551 U.S. 89, 93 (2007)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 679 (2009)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Jones v. Blanas, 393 F.3d 918, 934-35 (9th Cir. 2004)
- Monell v. Department of Social Services, 436 U.S. 658, 690-91 (1978)
- Taylor v. List, 880 F.2d 1040, 1045 (9th Cir. 1989)
- Plumeau v. School District #40 County of Yamhill, 130 F.3d 432, 438 (9th Cir. 1997)
- AE v. County of Tulare, 666 F.3d 631, 636-37 (9th Cir. 2012)
- Woods v. Carey, 684 F.3d 934, 935 (9th Cir. 2012)
- Albino v. Baca, 747 F.3d 1162, 1166, 1168 (9th Cir. 2014) (en banc)
- Wyatt v. Terhune, 315 F.3d 1108, 1119 (9th Cir. 2003)
- Rand v. Rowland, 154 F.3d 952, 962-63 (9th Cir. 1998)