

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Johnell Williams, Individually and on Behalf of the Estate of Johnell
Walker v. Jefferson Parish, et al.

Williams v. Jefferson Parish · No. 22-3971 · Decided March 25, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana granted Sheriff Joseph P. Lopinto's motion for summary judgment in claims arising from an inmate's fatal drug overdose at the Jefferson Parish Correctional Center. The court held that the plaintiff failed to establish an underlying constitutional violation supporting official-capacity liability under 42 U.S.C. § 1983, and dismissed the related Louisiana survival and wrongful-death claims with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Jay C. Zainey
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	March 25, 2026
DOCKET	22-3971
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant Sheriff Joseph P. Lopinto, III moved for summary judgment on the remaining official-capacity claims under 42 U.S.C. § 1983 and Louisiana law. The court considered the motion on the briefs and granted it.
STANDARD OF REVIEW	Summary judgment is proper when the record, viewed in the light most favorable to the nonmovant, shows no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. After the movant shows an absence of evidence supporting the nonmovant's claim, the nonmovant must identify specific facts showing a genuine issue for trial.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Johnell Williams, individually and on behalf of the Estate of Johnell Walker v. Jefferson Parish, Joseph P. Lopinto, III

TOPICS

summary judgment

section 1983

municipal liability

prisoners rights

civil rights

PRACTICE AREAS

civil rights

constitutional law

municipal liability

prisoner litigation

summary judgment

QUESTIONS PRESENTED

1. Whether the plaintiff presented evidence of an underlying Eighth Amendment violation sufficient to support official-capacity claims for failure to protect, train, supervise, or discipline under 42 U.S.C. § 1983.
2. Whether the alleged failure to detect drugs smuggled into the jail, or a deputy's violation of jail policy, constituted deliberate indifference under the Eighth Amendment.
3. Whether the Louisiana survival and wrongful-death claims could proceed when they were predicated on the failed underlying § 1983 claim and the prisoner's own willful act.

HOLDINGS

1. The official-capacity claims against Sheriff Lopinto fail because the plaintiff did not establish an underlying constitutional violation. A public entity cannot be liable under § 1983 for inadequate training, supervision, or discipline absent a constitutional violation caused by an official policy or custom.
2. The plaintiff did not establish an Eighth Amendment violation based on Walker's voluntary ingestion of narcotics or the jail's failure to detect drugs smuggled into the facility.
3. A deputy's possible violation of jail policy, without more, did not rise to the level of deliberate indifference or establish a constitutional violation actionable under § 1983.
4. The plaintiff's survival and wrongful-death claims were dismissed because their viability was predicated on the failed underlying § 1983 claim, and Louisiana law does not impose liability for injuries attributable to the prisoner's own willful act under the circumstances presented.

KEY QUOTATIONS

“To state a Monell claim, the plaintiff must allege 1) that the municipality’s training, supervisory, or disciplinary policies or practices were inadequate, 2) that the municipality was deliberately indifferent in adopting the deficient policies, and 3) that the inadequate training, supervisory, or disciplinary policies directly caused the violation in question.”

“There is no dispute that Walker willingly ingested the drugs that led to his overdose. He cannot claim that the mere fact that drugs were smuggled into the prison somehow incapacitated him from exercising “ordinary responsibility for his own welfare.””

“Violations of prison rules do not alone rise to the level of constitutional violations, and therefore, such claims are not actionable under § 1983.”

FACTUAL BACKGROUND

Johnell Walker was housed at the Jefferson Parish Correctional Center when he overdosed on narcotics smuggled into the facility by another inmate. Walker had willingly ingested the drugs, and his death was ruled an accidental overdose. Although an on-duty deputy may have left his assigned post earlier in the day, the record indicated that he was back at the post when Walker was discovered, and deputies promptly administered CPR until emergency medical personnel arrived. The jail had policies and procedures intended to prevent contraband from entering the facility.

PROCEDURAL HISTORY

The plaintiff brought claims arising from Johnell Walker's death while housed at the Jefferson Parish Correctional Center. The remaining claims were against Sheriff Lopinto in his official capacity for failure to protect, supervise, and train, as well as Louisiana survival and wrongful-death claims. The court granted Sheriff Lopinto's motion for summary judgment and dismissed all remaining claims with prejudice.

DISPOSITION

dismissed

CASES CITED

- TIG Ins. Co. v. Sedgwick James, 276 F.3d 754, 759 (5th Cir. 2002)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248-50, 255 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 325 (1986)
- Matsushita Elec. Indus. Co. v. Zenith Radio, 475 U.S. 574, 587 (1986)
- SEC v. Recile, 10 F.3d 1093, 1097 (5th Cir. 1993)
- Watt v. City of New Orleans, 2022 WL 17844624, at *3 (E.D. La. Dec. 22, 2022)
- Monell v. Department of Social Services, 436 U.S. 658 (1978)
- Hankins v. Wheeler, 2022 WL 2208848, at *7 (E.D. La. June 21, 2022)
- Ratliff v. Aransas Cnty., 948 F.3d 281, 285 (5th Cir. 2020)
- Whitley v. Hanna, 726 F.3d 631 (5th Cir. 2013)
- Bustos v. Martini Club, Inc., 599 F.3d 458, 467 (5th Cir. 2010)
- Legate v. Livingston, 822 F.3d 207, 211 (5th Cir. 2016)
- Wronke v. Champaign Cty. Sheriff's Office, 132 F. App'x 58, 61 (7th Cir. 2005)
- Hudson v. Palmer, 468 U.S. 517, 526-27 (1984)
- Hernandez v. Estelle, 788 F.2d 1154, 1158 (5th Cir. 1986)
- Greene v. DeMoss, 2020 WL 7755690, at *10 (W.D. La. Dec. 11, 2020)
- Greene v. DeMoss, 2020 WL 7755655 (W.D. La. Dec. 29, 2020)
- Abshire v. Prator, 392 F. App'x 267 (5th Cir. 2010)
- Barlow v. City of New Orleans, 257 La. 91, 241 So. 2d 501, 504 (1970)

