

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Julius A. Littlejohn v. City of Chicago and Cesar H. Villalobos

Littlejohn · No. 1:25-cv-06195 · Decided January 8, 2026

SUMMARY

The court grants in part and denies in part defendants’ motion to dismiss Julius A. Littlejohn’s claims arising from his arrest and prosecution for criminal trespass. The court allows the federal and Illinois false-arrest claims, the federal Fourth Amendment malicious-prosecution claim, and the related respondeat superior claim against the City of Chicago to proceed, while dismissing the Illinois malicious-prosecution claim without prejudice. The court declines to consider body-worn-camera footage and the misdemeanor complaint at the pleading stage because they were not properly incorporated into the complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Manish S. Shah
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	January 8, 2026
DOCKET	1:25-cv-06195
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss claims arising from Littlejohn's arrest, detention, and criminal trespass prosecution. The court granted the motion in part and denied it in part.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, disregards legal conclusions, draws reasonable inferences in the plaintiff's favor, and asks whether the complaint states a plausible claim for relief. Qualified immunity supports dismissal at this stage only when the well-pleaded allegations do not state a violation of clearly established law.
PRECEDENTIAL VALUE	district court opinion; precedential status unknown

PARTIES

Julius A. Littlejohn v. City of Chicago, Cesar H. Villalobos

TOPICS

motions to dismiss

civil procedure

section 1983

police misconduct

qualified immunity

PRACTICE AREAS

civil procedure

civil rights

constitutional law

torts

municipal law

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated federal and Illinois false-arrest claims despite defendants' reliance on body-worn-camera footage and the misdemeanor complaint.
2. Whether the complaint plausibly stated a Fourth Amendment malicious-prosecution claim under 42 U.S.C. § 1983.
3. Whether the complaint adequately pleaded favorable termination for an Illinois malicious-prosecution claim.
4. Whether the City of Chicago could be held liable under respondeat superior for the surviving Illinois false-arrest claim.
5. Whether the Illinois malicious-prosecution claim should be dismissed without prejudice because amendment might not be futile.

HOLDINGS

1. The court may not consider body-worn-camera footage that was neither attached to nor referenced in the complaint, or a misdemeanor complaint that was neither attached nor incorporated by reference, when deciding the motion to dismiss.
2. The allegations that no one from AutoZone notified Littlejohn that he was not allowed on the property, that Villalobos handcuffed him upon arriving, and that AutoZone did not tell Villalobos he had been asked to leave plausibly stated seizure without probable cause under federal and Illinois law.
3. Littlejohn adequately stated a Fourth Amendment claim for malicious prosecution under 42 U.S.C. § 1983.
4. The Illinois malicious-prosecution claim was insufficiently pleaded and was dismissed without prejudice.
5. Because the state-law false-arrest claim survived, the respondeat-superior claim against the City also survived.

KEY QUOTATIONS

“To survive a motion to dismiss under Rule 12(b)(6), “a complaint must contain sufficient factual matter,” to “state a claim to relief that is plausible on its face.”” (Statement)

“Generally, a district court cannot consider evidence outside the pleadings to decide a motion to dismiss without converting it into a motion for summary judgment.” (Statement)

“Littlejohn has not pled himself out of court.” (Statement)

“A person is seized by the police and thus entitled to challenge the government’s action under the Fourth Amendment when the officer, ‘by means of physical force or show of authority,’ terminates or restrains his freedom of movement.” (Statement)

FACTUAL BACKGROUND

In May 2025, Chicago police officer Cesar Villalobos detained Julius Littlejohn in an AutoZone parking lot where Littlejohn met clients and worked on vehicles. Littlejohn alleged that no one from AutoZone told him he was not permitted on the property and that Villalobos handcuffed him upon arriving at the lot. Littlejohn was arrested, held for several hours, and released; a misdemeanor criminal-trespass complaint was later filed against him, and the charge was dismissed.

PROCEDURAL HISTORY

Littlejohn filed suit against Officer Cesar Villalobos in his individual capacity and the City of Chicago, alleging false arrest and malicious prosecution under federal and Illinois law. Defendants moved to dismiss and relied in part on body-worn-camera footage and the misdemeanor complaint. The court declined to consider materials outside the pleadings, allowed the federal false-arrest and Fourth Amendment malicious-prosecution claims and the related respondeat-superior claim to proceed, and dismissed the Illinois malicious-prosecution claim without prejudice.

DISPOSITION

other

CASES CITED

- Wertymer v. Walmart, Inc., 142 F.4th 491 (7th Cir. 2025)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Kap Holdings, LLC v. Mar-Cone Appliance Parts Co., 55 F.4th 517, 523 (7th Cir. 2022)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Orr v. Shicker, 147 F.4th 734, 740–41 (7th Cir. 2025)
- Swanson v. Citibank, N.A., 614 F.3d 400, 404 (7th Cir. 2010)
- Tobey v. Chibucos, 890 F.3d 634, 648 (7th Cir. 2018)
- Geinosky v. City of Chicago, 675 F.3d 743, 745 n.1 (7th Cir. 2012)
- Daniel Jackson v. Shawn Curry, Jackson v. Curry, 888 F.3d 259, 263 (7th Cir. 2018)
- Esco v. City of Chicago, 107 F.4th 673 (7th Cir. 2024)
- Tierney v. Vahle, 304 F.3d 734, 738 (7th Cir. 2002)
- Hanson v. LeVan, 967 F.3d 584, 590 (7th Cir. 2020)

- Behrens v. Pelletier, 516 U.S. 299, 306 (1996)
- Lee v. Harris, 127 F.4th 666, 672 (7th Cir. 2025)
- Garcia v. Posewitz, 79 F.4th 874, 879–80 (7th Cir. 2023)
- Lyberger v. Snider, 42 F.4th 807, 813 (7th Cir. 2022)
- Woods v. City of Chicago, 234 F.3d 979, 996 (7th Cir. 2000)
- Thompson v. Clark, 596 U.S. 36, 42–44, 49 (2022)
- Brendlin v. California, 551 U.S. 249, 254 (2007)
- Swick v. Liautaud, 169 Ill. 2d 504, 513 (1996)
- Runnion ex rel. Runnion v. Girl Scouts of Greater Chicago and N.W. Indiana, 786 F.3d 510, 519–20 (7th Cir. 2015)

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