

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

James Young v. Jenna Razz-Wellington, et al.

No. 3:24-cv-00117 (MPS) (D. Conn. Jan. 6, 2026) · No. No. 3:24-cv-00117 (MPS) · Decided January 6, 2026

SUMMARY

The United States District Court for the District of Connecticut grants the Stratford Defendants’ motion for summary judgment in James Young’s 42 U.S.C. § 1983 action. The court concludes that the officers had probable cause to arrest Young based on an active arrest warrant, that the alleged supervisor was not personally involved, and that Young lacked a reasonable expectation of privacy in the property where he was arrested.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Connecticut                                                                                                                                                                                                                                                                                                                                                                                             |
| WRITING FOR THE COURT | Michael P. Shea                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the District of Connecticut                                                                                                                                                                                                                                                                                                                                                                                             |
| DECIDED               | January 6, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| DOCKET                | No. 3:24-cv-00117 (MPS)                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | The plaintiff brought claims under 42 U.S.C. § 1983 against Stratford police officers and the Town of Stratford for alleged violations of the Fourth, Eighth, and Fourteenth Amendments. The Stratford Defendants moved for summary judgment, and the plaintiff opposed the motion and filed a cross-motion for summary judgment.                                                                                                                        |
| STANDARD OF REVIEW    | Summary judgment is appropriate 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 construes facts in the light most favorable to the nonmoving party, resolves ambiguities and draws reasonable inferences against the movant, and requires the nonmovant to identify specific evidence showing a genuine dispute rather than rely on conclusory allegations or speculation. |
| PRECEDENTIAL VALUE    | unpublished district court opinion                                                                                                                                                                                                                                                                                                                                                                                                                       |
| PARTIES               | James Young v. Jenna Razz-Wellington, et al.                                                                                                                                                                                                                                                                                                                                                                                                             |

TOPICS

section 1983

summary judgment

fourth amendment

due process

municipal liability

## PRACTICE AREAS

civil rights

constitutional law

civil procedure

criminal procedure

municipal liability

## QUESTIONS PRESENTED

1. Whether the Stratford officers violated the Fourth Amendment by arresting and searching Young without physically possessing or producing an arrest warrant.
2. Whether the officers violated the Fourth Amendment by entering the backyard or curtilage of the residence where Young was present.
3. Whether the officers violated the Eighth Amendment through cruel and unusual punishment, excessive bail, or unlawful imprisonment before Young's criminal case was resolved.
4. Whether the officers violated Young's procedural or substantive due process rights under the Fourteenth Amendment.
5. Whether the Town of Stratford or the alleged supervisor could be liable under 42 U.S.C. § 1983 absent an underlying constitutional violation or personal involvement.

## HOLDINGS

1. The officers did not violate the Fourth Amendment by arresting Young without physically possessing or showing him a copy of the arrest warrant. Information from the law-enforcement database confirming an active arrest warrant established probable cause to arrest.
2. Because the officers had probable cause to arrest Young, the seizure and subsequent weapons search were reasonable under the Fourth Amendment.
3. Young could not establish a Fourth Amendment violation based on the officers' entry onto the property because he lacked a reasonable expectation of privacy in the residence or its curtilage. He was a visitor at a residence owned by his ex-wife's family and was not shown to be an overnight guest.
4. The Stratford Defendants were entitled to summary judgment on Young's cruel-and-unusual-punishment claim because he had not been convicted and sentenced. His bail-related claim also failed because he offered no evidence that the Stratford Defendants participated in setting bail or release conditions.
5. The Fourteenth Amendment claims failed because conduct governed by a more specific constitutional provision must be analyzed under that provision, the arrest was supported by probable cause, and Young offered no evidence that the Stratford officers were involved in bail or pretrial-detention decisions.
6. Iannucci was entitled to summary judgment because § 1983 does not impose vicarious liability on supervisors and the record showed no personal involvement in Young's arrest, detention, or transport.
7. The Town of Stratford was entitled to summary judgment on Young's policy, custom, training, and supervision claims because Young failed to establish an underlying constitutional violation.

## KEY QUOTATIONS

*“Supervisors cannot be vicariously liable for the actions of their subordinates under Section 1983.”*

*“Because a constitutional violation is a prerequisite to any finding of municipal liability, the municipality is entitled to summary judgment where that prerequisite is absent.”*

*“There is no constitutional obligation on the part of law enforcement to show an arrestee a copy of the warrant at the time of arrest.”*

## FACTUAL BACKGROUND

Stratford officers Kenneth Kubel and Uriel Jarrett responded to a report that Young was threatening his son at a residence owned by the family of Young's ex-wife. During the investigation, the officers obtained Young's identifying information and were informed through law-enforcement databases and dispatch that Fairfield police had an active arrest warrant for Young for violating a protective order, with a \$75,000 bond. The officers arrested and searched Young and transported him to the Stratford Police Department, where he remained for approximately one hour before Fairfield police took custody of him. Young was a visitor at the residence and did not own or reside there.

## PROCEDURAL HISTORY

Young filed this § 1983 action against officers Kenneth Kubel, Uriel Jarrett, and James Iannucci in their individual and official capacities, and against the Town of Stratford. The court denied Young's motions to substitute Kubel and denied his motion to amend the complaint. Following discovery, the Stratford Defendants moved for summary judgment. The court granted their motion, denied Young's motion for summary judgment, and directed the clerk to terminate the Stratford Defendants.

## DISPOSITION

other

## CASES CITED

- DeLotch v. Wal-Mart Stores, Inc., No. 06-cv-5483, 2008 WL 11395591, at \*2 (S.D.N.Y. June 16, 2008)
- Mitchell v. Dep't of Corr., No. 05-cv-5792, 2008 WL 744041, at \*7 (S.D.N.Y. Feb. 20, 2008)
- Meiji v. Roma Cleaning, Inc., 751 Fed. App'x 134, 137 (2d Cir. 2018) (summary order)
- Black v. Wrigley, No. 16-cv-430, 2021 WL 4932129, at \*1 n.1 (E.D.N.Y. Sept. 21, 2021), aff'd, No. 21-2553, 2023 WL 2591014 (2d Cir. Mar. 22, 2023)
- Mian v. Donaldson, Lufkin & Jenrette Sec. Corp., 7 F.3d 1085, 1087-88 (2d Cir. 1993)
- Tolan v. Cotton, 572 U.S. 650, 656-57 (2014)
- Caronia v. Philip Morris USA, Inc., 715 F.3d 417, 427 (2d Cir. 2013)
- Zann Kwan v. Andalex Grp. LLC, 737 F.3d 834, 843 (2d Cir. 2013)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-25 (1986)
- Brown v. Eli Lilly & Co., 654 F.3d 347, 358 (2d Cir. 2011)
- Bertin v. U.S., 478 F.3d 489, 491 (2d Cir. 2007)

- Meriwether v. Coughlin, 879 F.2d 1037, 1046 (2d Cir. 1989)
- Wright v. Smith, 21 F.3d 496, 501 (2d Cir. 1994)
- Westry v. City of Waterbury, No. 3:22-cv-686, 2023 WL 3259878, at \*6 n.3 (D. Conn. May 4, 2023)
- South Dakota v. Opperman, 428 U.S. 364, 372-73 (1976)
- Walczyk v. Rio, 496 F.3d 139, 155-56 (2d Cir. 2007)
- Parkman v. O'Connor, No. 3:18-cv-1358, 2019 WL 2015899, at \*3 n.6 (D. Conn. May 6, 2019)
- Siddiqui v. Rocheleau, No. 3:18-cv-00839, 2019 WL 12239678, at \*17 (D. Conn. May 15, 2019)
- Standley v. Dennison, No. 9:05-cv-1033, 2007 WL 2406909, at \*8 (N.D.N.Y. 2007)
- U.S. v. Miller, 265 Fed. App'x 5, 7 (2d Cir. 2008) (summary order)
- U.S. v. Ross, No. 21-cr-571, 2023 WL 6160436, at \*8 (E.D.N.Y. July 31, 2023), adopted, 2023 WL 6158840 (E.D.N.Y. Sept. 21, 2023)
- Dirienzo v. U.S., 690 F. Supp. 1149, 1154 n.4 (D. Conn. July 12, 1988)
- Benjamin v. U.S., 554 F. Supp. 82, 86 (E.D.N.Y. 1982)
- Arizona v. Gant, 556 U.S. 332, 338 (2009)
- Harris v. O'Hare, 770 F.3d 224, 240 (2d Cir. 2014)
- U.S. v. Maher, 120 F.4th 297, 319 (2d Cir. 2024)
- U.S. v. Payner, 447 U.S. 727, 731 (1980)
- Minnesota v. Carter, 525 U.S. 83, 90 (1998)
- Minnesota v. Olson, 495 U.S. 91, 98 (1990)
- Whitley v. Albers, 475 U.S. 312, 318 (1986)
- Hurd v. Fredenburgh, 984 F.3d 1075, 1087 (2d Cir. 2021)
- Conn v. Gabbert, 526 U.S. 286, 293 (1999)
- Russo v. City of Bridgeport, 479 F.3d 196, 208-09 (2d Cir. 2007)
- Karcz v. City of North Tonawanda, No. 16-cv-0628, 2024 WL 5239726, at \*5 (W.D.N.Y. Dec. 27, 2024)
- Levantino v. Skala, 56 F. Supp. 3d 191, 203 (E.D.N.Y. 2014)
- U.S. v. McDermott, 918 F.2d 319, 325 (2d Cir. 1990)
- Ortiz v. Vill. of Monticello, N.Y., No. 06-cv-2208, 2012 WL 5395255, at \*10 (S.D.N.Y. Nov. 2, 2012)
- Wilson v. City of New York, 480 F. App'x 592, 594-95 (2d Cir. 2012) (summary order)
- Monell v. Dep't of Soc. Servs. of N.Y.C., 436 U.S. 658, 690-91 (1978)
- Connick v. Thompson, 563 U.S. 51, 61 (2011)
- Segal v. City of N.Y., 459 F.3d 207, 219 (2d Cir. 2006)
- Thomas v. Genova, No. 23-7452, 2025 WL 583182, at \*5 (2d Cir. Feb. 24, 2025) (summary order)

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