

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Enrique Javier Campos v. West County Detention Facility, et al.

Campos · No. 25-cv-06190-RMI · Decided October 24, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed Enrique Javier Campos’s 42 U.S.C. § 1983 complaint concerning alleged harassment, medication checks, and use of a flashlight by a jail deputy. The court held that the allegations did not state a cognizable constitutional claim, that the detention facility was not a proper § 1983 defendant, and that participation in the grievance process was insufficient. The dismissal was with leave to amend within 28 days.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Robert M. Illman
JURISDICTION	United States District Court for the Northern District of California
DECIDED	October 24, 2025
DOCKET	25-cv-06190-RMI
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se pretrial detainee filed an action under 42 U.S.C. § 1983. The district court screened the complaint under 28 U.S.C. § 1915A and dismissed it for failure to state a cognizable constitutional claim, granting leave to amend.
STANDARD OF REVIEW	Preliminary screening under 28 U.S.C. § 1915A; the complaint must state a plausible claim for relief under Federal Rule of Civil Procedure 8(a)(2), and pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	Unpublished district court order; generally nonprecedential outside the case.
PARTIES	Enrique Javier Campos v. West County Detention Facility, et al.

TOPICS

- section 1983
- prisoners rights
- due process
- pleadings
- civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a cognizable Fourteenth Amendment conditions-of-confinement or excessive-force claim under 42 U.S.C. § 1983.
2. Whether the jail facility could be sued as a person under § 1983.
3. Whether allegations that supervisors participated only in the grievance process stated a § 1983 claim.
4. Whether dismissal should be with leave to amend.

HOLDINGS

1. A pretrial detainee challenging conditions of confinement must allege facts showing that the conditions amounted to punishment in violation of the Fourteenth Amendment. The allegations that Deputy Bailly shined a light in Plaintiff's face and checked whether he took his medication did not state a constitutional violation.
2. A pretrial detainee asserting excessive force must allege that the force purposely or knowingly used against him was objectively unreasonable. The complaint did not state such a claim based on the alleged flashlight use.
3. A jail is not a person within the meaning of 42 U.S.C. § 1983 and therefore cannot be sued under that statute.
4. Allegations that officials merely participated in or denied a grievance do not, without more, state a constitutional violation. A defendant must have personally participated in or directed the underlying violation.
5. The complaint was dismissed with leave to amend because Plaintiff could potentially state a claim by alleging additional facts concerning conduct that amounted to punishment, lacked a legitimate purpose, or constituted unreasonable force.

KEY QUOTATIONS

"To constitute punishment, a government action must (i) harm a detainee and (ii) be intended to punish him."
(Order at 2)

"Denying a grievance is not in and of itself a constitutional violation." (Order at 3)

"Defendants are only liable under section 1983 if they personally participated in or directed a violation of Plaintiff's rights." (Order at 3)

FACTUAL BACKGROUND

Plaintiff, a pretrial detainee at the Contra Costa County jail, alleged that Deputy Bailly yelled at him while shining a flashlight in his face, harassed him, ordered him to approach, and accused him of concealing or snorting medication. Sergeants Paisan, Smally, and Shepard responded through the grievance process, stating

that Baily's conduct was permitted or appropriate under jail policy. Plaintiff sought damages and an order requiring Baily to stay away from him.

PROCEDURAL HISTORY

Campos filed a civil-rights complaint concerning conduct by jail personnel and sought damages and a stay-away order against one deputy. The court conducted the required preliminary screening, found that the allegations did not state a constitutional violation, and dismissed the complaint with leave to amend within twenty-eight days.

DISPOSITION

dismissed

CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1990)
- *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)
- *Bell v. Wolfish*, 441 U.S. 520, 535 n.16, 539 (1979)
- *Houston v. Maricopa County*, 116 F.4th 935, 940 (9th Cir. 2024)
- *Kingsley v. Hendrickson*, 576 U.S. 389, 397 (2015)
- *James v. Rowlands*, 606 F.3d 646, 653 n.3 (9th Cir. 2010)
- *Ferdik v. Bonzelet*, 963 F.2d 1258, 1262 (9th Cir. 1992)