

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Walter Flores v. Michael T. Wood, et al.

No. 24-cv-1230-KWR-GBW (D.N.M. Feb. 25, 2026) · No. No. 24-cv-1230-KWR-GBW · Decided February 25, 2026

SUMMARY

The United States District Court for the District of New Mexico granted Sheriff Michael T. Wood’s motion to dismiss Walter Flores’s amended 42 U.S.C. § 1983 complaint. The court held that Flores’s failure-to-train allegations were conclusory and insufficient to state a municipal-liability claim, and further concluded that his claims concerning an allegedly unlawful search and fabricated evidence were barred by Heck v. Humphrey. The claims were dismissed without prejudice, and the court directed entry of final judgment.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	Kea W. Riggs
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	February 25, 2026
DOCKET	No. 24-cv-1230-KWR-GBW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant Sheriff Michael T. Wood moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Plaintiff’s amended 42 U.S.C. § 1983 complaint. The court also screened the amended complaint under 28 U.S.C. § 1915(e).
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court tests the sufficiency of the allegations within the four corners of the complaint, accepts well-pleaded factual allegations as true, views them in the light most favorable to the plaintiff, and determines whether the complaint states a facially plausible claim. The court also screened the in forma pauperis complaint under 28 U.S.C. § 1915(e).
PRECEDENTIAL VALUE	unpublished
PARTIES	Walter Flores v. Michael T. Wood, Marcos Blais

TOPICS

motions to dismiss

section 1983

police misconduct

fourth amendment

due process

PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner litigation

habeas corpus

QUESTIONS PRESENTED

1. Whether the amended complaint stated a plausible official-capacity failure-to-train claim under 42 U.S.C. § 1983.
2. Whether *Heck v. Humphrey* barred Flores's claims because finding that the search was unlawful or that evidence was fabricated would necessarily imply the invalidity of his still-valid criminal convictions.
3. Whether District Attorney Marcos Blais remained a defendant after Flores omitted him from the amended complaint.

HOLDINGS

1. Because an amended complaint supersedes the original complaint and Flores omitted Blais from the amended pleading and alleged no facts concerning him, Blais was treated as voluntarily dismissed.
2. The amended complaint failed to state a plausible failure-to-train claim because it offered only the conclusory allegation that Sheriff Wood failed to train officers and alleged no facts showing a pattern of similar constitutional violations or that the need for additional training was obvious to municipal policymakers.
3. *Heck v. Humphrey* barred the claims because the alleged unlawful search and fabricated evidence claims, as pleaded, necessarily called into question the validity of Flores's still-valid convictions.

KEY QUOTATIONS

“A failure to train or supervise employees may subject a municipal entity to liability under § 1983 if such a failure results from deliberate indifference.” (5)

“Plaintiff’s Amended Complaint provides only a conclusory allegation that Defendant Sheriff Wood did not properly train his officers.” (6)

“This Court cannot issue a judgment concluding there was an issue with the evidence obtained and used in his trial because Plaintiff’s state criminal conviction necessarily established that the evidence used to convict him was proper.” (7)

“Accordingly, Plaintiff’s claims are dismissed without prejudice and may be raised in a future complaint if he prevails in Flores v. Sugg, et al., Case No. 1:25-cv-00242-KWR-JHR.” (8)

FACTUAL BACKGROUND

Flores was arrested in New Mexico in 2022 for aggravated assault and battery with a deadly weapon, convicted by a jury, and sentenced to 14.5 years' imprisonment; the New Mexico Supreme Court affirmed. In this civil action, he alleged that Detective Bryce Bailey served a search warrant before it was approved, that Sheriff

Michael T. Wood failed to train Bailey, and that fabricated gun-residue evidence was used against him. Flores's habeas petition challenging the convictions was pending when this action was dismissed.

PROCEDURAL HISTORY

Flores initially sued Sheriff Michael T. Wood and District Attorney Marcos Blais, alleging due-process violations arising from his state criminal prosecution and seeking to vacate his convictions and obtain damages. The court previously dismissed the original complaint, allowed an amendment, and advised that claims seeking to invalidate the convictions belonged in habeas proceedings. Flores amended the complaint against Wood in his official capacity, omitting Blais and alleging failure to train related to an allegedly premature search-warrant execution and fabricated gun-residue evidence. The court deemed Blais voluntarily dismissed, granted Wood's motion to dismiss, and entered final judgment closing the case.

DISPOSITION

dismissed

CASES CITED

- *Mitchell v. Dowling*, 672 Fed. App'x 792, 794 (10th Cir. 2016)
- *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994)
- *Miller v. Glanz*, 948 F.2d 1562, 1565 (10th Cir. 1991)
- *Royal Canin U.S.A., Inc. v. Wullschleger*, 604 U.S. 22, 35-36 (2025)
- *Mobley v. McCormick*, 40 F.3d 337, 340 (10th Cir. 1994)
- *Smith v. United States*, 561 F.3d 1090, 1097 (10th Cir. 2009), cert. denied, 558 U.S. 1148 (2010)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Kentucky v. Graham*, 473 U.S. 159, 165 (1985)
- *Monell v. New York City Department of Social Services*, 436 U.S. 658, 690 n.55 (1978)
- *Brandon v. Holt*, 469 U.S. 464, 471-72 (1985)
- *City of Canton v. Harris*, 489 U.S. 378, 387-91 (1989)
- *Currier v. Doran*, 242 F.3d 905, 925 (10th Cir. 2001)
- *Felts v. Board of County Commissioners of Valencia County*, No. 13-CV-1094 MCA/SCY, 2016 WL 9778162, at *9 (D.N.M. Sept. 23, 2016)
- *Carr v. Castle*, 337 F.3d 1221, 1229 (10th Cir. 2003)
- *Connick v. Thompson*, 563 U.S. 51, 62 (2011)
- *Corona v. City of Clovis*, No. 2:17-CV-805 JCH/CG, 2019 WL 3779526, at *6 (D.N.M. Aug. 12, 2019)
- *Lemmons v. Clymer*, 609 Fed. App'x 949, 956-57 (10th Cir. 2015)
- *Hall v. Bellmon*, 935 F.2d 1106, 1110 (10th Cir. 1991)
- *Laurino v. Tate*, 220 F.3d 1213, 1217 (10th Cir. 2000)
- *Beck v. City of Muskogee Police Department*, 195 F.3d 553, 558 (10th Cir. 1999)
- *Garza v. Burnett*, 672 F.3d 1217, 1218, 1220 (10th Cir. 2012)

- Ventris v. Kansas, 516 Fed. App'x 688, 688-89 (10th Cir. 2013)
- Hernandez v. Agent David Corp., No. CIV-99-0895 BB/LCS, 1999 WL 35808318, at *2 (D.N.M. Nov. 5, 1999)

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