

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sandy Holt v. Sacramento County Sheriff's Department, et al.

Holt · No. 2:24-cv-03256-DJC-CSK · Decided April 25, 2025

SUMMARY

The United States District Court for the Eastern District of California grants Sandy Holt’s application to proceed in forma pauperis. The court screens the complaint under 28 U.S.C. § 1915(e), dismisses the Section 1983 claims against the Sacramento County Sheriff’s Department, Sheriff Jim Cooper, and the Sacramento County Board of Supervisors for failure to state sufficient claims, and grants leave to amend. Holt is given 30 days to file an amended complaint complying with Federal Rule of Civil Procedure 8 and related pleading requirements.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 25, 2025
DOCKET	2:24-cv-03256-DJC-CSK
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se 42 U.S.C. § 1983 complaint and requested leave to proceed in forma pauperis. The court screened the complaint under 28 U.S.C. § 1915(e), granted IFP status, dismissed the complaint for failure to state a claim, and granted leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court screens an IFP complaint and must dismiss it if frivolous, malicious, unable to state a claim, or seeking monetary relief from an immune defendant. The court accepts well-pleaded factual allegations as true, construes them in the light most favorable to the plaintiff, liberally construes pro se pleadings, and disregards conclusory allegations, unreasonable inferences, and unwarranted factual deductions.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Sandy Holt v. Sacramento County Sheriff's Department, Jim Cooper,
Sacramento Board of Supervisors

TOPICS

pleadings

section 1983

municipal liability

civil procedure

due process

PRACTICE AREAS

civil procedure

civil rights

constitutional law

municipal liability

QUESTIONS PRESENTED

1. Whether the complaint stated any plausible claim under 42 U.S.C. § 1983 against the Sacramento County Board of Supervisors.
2. Whether the complaint stated a § 1983 claim against Sheriff Jim Cooper based on supervisory liability.
3. Whether the complaint stated a municipal-liability claim against the Sacramento County Sheriff's Department under Monell.
4. Whether the complaint satisfied Federal Rule of Civil Procedure 8 and the pleading requirements applicable to a pro se § 1983 complaint.
5. Whether Holt should receive leave to amend.

HOLDINGS

1. The complaint failed to state a claim under § 1983 because it relied on conclusory allegations and did not provide a short and plain statement identifying specific acts by specific defendants that plausibly established constitutional violations.
2. The claims against the Sacramento Board of Supervisors were dismissed because the complaint alleged no specific connection between the Board and the claimed constitutional violations.
3. The claims against Sheriff Cooper were dismissed because the complaint alleged no facts connecting him personally to the alleged constitutional violations and appeared to rely only on his supervisory position.
4. The complaint failed to state a Monell claim because it did not identify a specific county policy or custom that caused a constitutional injury.
5. Holt was granted leave to amend because, given her pro se status, it was at least conceivable that additional facts could cure the pleading deficiencies.

KEY QUOTATIONS

“To state a claim on which relief may be granted, the plaintiff must allege enough facts ‘to state a claim to relief that is plausible on its face.’” (at 3)

“In order to establish municipal liability [under Monell], a plaintiff must show that a ‘policy or custom’ led to the plaintiff’s injury.” (at 6)

“The amended complaint must not require the Court and the defendants to guess at what is being alleged against whom.” (at 8)

FACTUAL BACKGROUND

Holt alleged that Sacramento County Sheriff's deputies directed the towing of her 2007 Dodge Charger from an apartment-building parking lot on December 23, 2023, purportedly because of expired registration. She alleged that officers ignored her offer to move the vehicle, failed to provide adequate information on the notice of stored vehicle, and did not follow a county abatement program providing 72 hours to move vehicles. She further alleged that the tow hearing officer declared the tow legal before allowing her to present evidence and required her to leave when she sought a supervisor.

PROCEDURAL HISTORY

Holt filed a civil-rights complaint alleging constitutional violations arising from the towing of her vehicle and sought to proceed in forma pauperis. The court found that the financial showing satisfied the IFP requirement but that the complaint failed to provide a short and plain statement of actionable claims and did not adequately allege personal involvement, municipal policy or custom, or other facts supporting § 1983 liability. The complaint was dismissed with leave to amend within 30 days.

DISPOSITION

dismissed

CASES CITED

- *Lopez v. Smith*, 203 F.3d 1122 (9th Cir. 2000) (en banc)
- *Neitzke v. Williams*, 490 U.S. 319 (1989)
- *Von Saher v. Norton Simon Museum of Art at Pasadena*, 592 F.3d 954 (9th Cir. 2010)
- *Hebbe v. Pliler*, 627 F.3d 338 (9th Cir. 2010)
- *Western Mining Council v. Watt*, 643 F.2d 618 (9th Cir. 1981)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Cahill v. Liberty Mutual Insurance Co.*, 80 F.3d 336 (9th Cir. 1996)
- *Kimes v. Stone*, 84 F.3d 1121 (9th Cir. 1996)
- *Wilder v. Virginia Hospital Association*, 496 U.S. 498 (1990)
- *Albright v. Oliver*, 510 U.S. 266 (1994)
- *Florer v. Congregation Pidyon Shevuyim, N.A.*, 639 F.3d 916 (9th Cir. 2011)
- *Hansen v. Black*, 885 F.2d 642 (9th Cir. 1989)
- *Johnson v. Duffy*, 588 F.2d 740 (9th Cir. 1978)
- *Bogan v. Scott-Harris*, 523 U.S. 44 (1998)
- *Jones v. Allison*, 9 F.4th 1136 (9th Cir. 2021)

- Taylor v. List, 880 F.2d 1040 (9th Cir. 1989)
- Castro v. County of Los Angeles, 833 F.3d 1060 (9th Cir. 2016) (en banc)
- Monell v. Department of Social Services of City of New York, 436 U.S. 658 (1978)
- Anderson v. Warner, 451 F.3d 1063 (9th Cir. 2006)
- Oviatt v. Pearce, 954 F.2d 1470 (9th Cir. 1992)
- Lee v. City of Los Angeles, 250 F.3d 668 (9th Cir. 2001)
- Connick v. Thompson, 563 U.S. 51 (2011)
- Jones v. Community Redevelopment Agency, 733 F.2d 646 (9th Cir. 1984)
- McHenry v. Renne, 84 F.3d 1172 (9th Cir. 1996)
- Lacey v. Maricopa County, 693 F.3d 896 (9th Cir. 2012)

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