

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Schaffer v. Clay

No. 24-cv-04103-PCP (N.D. Cal. Mar. 31, 2025) · No. 24-cv-04103-PCP · Decided March 31, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed without prejudice the petitioner’s requests for release and dismissal of ongoing state criminal charges under Younger abstention and the federal habeas exhaustion requirements. The court held that claims concerning alleged forced medication and conversion therapy challenged conditions of confinement and could not proceed in habeas, but permitted the petitioner to choose whether to convert the action into a 42 U.S.C. § 1983 civil rights case or dismiss the remaining claims. The court also denied the petitioner’s in forma pauperis application and required a response by May 30, 2025.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	P. Casey Pitts
JURISDICTION	United States District Court for the Northern District of California
DECIDED	March 31, 2025
DOCKET	24-cv-04103-PCP
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner proceeding pro se filed a petition for a writ of habeas corpus under 28 U.S.C. § 2254 while his state criminal proceedings were ongoing. The district court conducted preliminary review under 28 U.S.C. § 2243 and Rule 4 of the Rules Governing Section 2254 Cases.
STANDARD OF REVIEW	The petition was reviewed under 28 U.S.C. § 2243 and Rule 4 of the Rules Governing Section 2254 Cases to determine whether the petitioner appeared entitled to relief.
PRECEDENTIAL VALUE	Unknown; district-court order with no reporter citation and no stated precedential designation.
PARTIES	Craig Raymond Schaffer v. Jennie Clay, et al.

TOPICS

federal habeas corpus

post-conviction relief

prisoners rights

civil rights

criminal procedure

PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the federal district court could grant habeas or injunctive relief interfering with Schaffer's ongoing state criminal proceedings.
2. Whether Schaffer's claims concerning forced medication and alleged conversion therapy were cognizable in a federal habeas action.
3. Whether the court could convert the habeas petition into a civil rights action under 42 U.S.C. § 1983 without first advising Schaffer of the consequences and providing an opportunity to withdraw or amend.
4. Whether Schaffer's motion to proceed in forma pauperis should be granted when the required initial assessment would exceed the habeas filing fee.

HOLDINGS

1. The court could not interfere with Schaffer's ongoing state criminal proceedings because Younger abstention applied and no extraordinary circumstance was shown. The requests for release and dismissal of the state criminal charges were therefore dismissed without prejudice.
2. Claims challenging conditions of confinement, including forced medication and alleged conversion therapy, did not lie at the core of habeas corpus and could not proceed in this § 2254 action. Such claims should be brought, if at all, under 42 U.S.C. § 1983.
3. The court would not immediately convert the habeas action into a § 1983 action. It required Schaffer to file a written response electing conversion, dismissal of the remaining petition, or voluntary dismissal after being advised of the financial and procedural consequences.

KEY QUOTATIONS

“Under Younger, this Court cannot interfere in the state trial court’s criminal proceedings.” (at 2)

“If the claim ‘does not lie at the ‘core of habeas corpus,’ it may not be brought in habeas corpus but must be brought, ‘if at all,’ under § 1983.” (at 4)

“Before doing so, a district court must advise the prisoner of the consequences of construing a habeas petition as a civil rights complaint and provide an opportunity to withdraw or amend the pleading.” (at 5)

FACTUAL BACKGROUND

Schaffer, a state prisoner, had not yet received a criminal trial in his pending San Francisco County Superior Court case. He sought federal dismissal of the state charges and release based on, among other things, an incompetency finding, alleged entrapment, swatting, illegal surveillance, stalking, and electronic warfare. He

also alleged that he was being forcibly medicated and subjected to conversion therapy related to his transgender identity.

PROCEDURAL HISTORY

Schaffer filed a federal habeas petition seeking dismissal of his pending state criminal charges and release, along with claims concerning forced medication and alleged conversion therapy. The district court dismissed the claims seeking release and dismissal of the state charges without prejudice under Younger abstention principles and denied a related motion to dismiss. The court concluded that the medical and confinement-condition claims were not cognizable in habeas and required Schaffer to elect whether to convert the action into a 42 U.S.C. § 1983 action or dismiss the remaining claims.

DISPOSITION

dismissed

CASES CITED

- Rose v. Hodges, 423 U.S. 19, 21 (1975)
- People v. Schaffer, Case No. CRI-23020851 (San Francisco Cty. Super. Ct. filed Dec. 22, 2023)
- Younger v. Harris, 401 U.S. 37 (1971)
- Mockaitis v. Harclerod, 104 F.3d 1522, 1528 (9th Cir. 1997)
- Gibson v. Berryhill, 411 U.S. 564, 577-79 (1973)
- Arevalo v. Hennessy, 882 F.3d 763, 767 (9th Cir. 2018)
- Betschart v. Oregon, 103 F.4th 607 (9th Cir. 2024)
- Dubinka v. Judges of the Superior Court, 23 F.3d 218, 223 (9th Cir. 1994)
- Edelbacher v. Calderon, 160 F.3d 582, 582-86 (9th Cir. 1998)
- Rose v. Lundy, 455 U.S. 509, 515-16 (1982)
- Bean v. Matteucci, 986 F.3d 1128, 1135-36 (9th Cir. 2021)
- Hill v. McDonough, 547 U.S. 573, 579 (2006)
- Nettles v. Grounds, 830 F.3d 922, 931, 936 (9th Cir. 2016)
- Ramirez v. Galaza, 334 F.3d 850, 859 (9th Cir. 2003)
- Wilwording v. Swenson, 404 U.S. 249, 251 (1971)