

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Chikodi Chima v. City and County of San Francisco, et al.

Case No. 25-cv-10294-CRB · No. 25-cv-10294-CRB · Decided January 6, 2026

SUMMARY

The United States District Court for the Northern District of California adopted a magistrate judge’s report and recommendation and dismissed Chikodi Chima’s action against the City and County of San Francisco and other defendants. The court held that the claims arose at their core from a state-court child-custody dispute and were subject to the domestic relations exception and abstention principles. The dismissal was without leave to amend and without prejudice to pursuing the claims in an appropriate forum.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Charles R. Breyer
JURISDICTION	United States District Court for the Northern District of California
DECIDED	January 6, 2026
DOCKET	25-cv-10294-CRB
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's report and recommendation recommending dismissal of his Second Amended Complaint under 28 U.S.C. § 1915(e) based on the domestic relations exception and abstention principles. The district court reviewed and adopted the report and recommendation and dismissed the case.
STANDARD OF REVIEW	The district court reviewed the report and recommendation and the plaintiff's timely objections de novo to the extent required, concluding that the recommendation was thorough, correct, and well-reasoned.
PRECEDENTIAL VALUE	unpublished
PARTIES	Chikodi Chima v. City and County of San Francisco, et al.

TOPICS

- family law
- child custody
- section 1983
- civil procedure

PRACTICE AREAS

civil rights

civil procedure

family law

QUESTIONS PRESENTED

1. Whether claims framed as constitutional, civil-rights, conspiracy, and tort claims must be dismissed under the domestic relations exception when their core is a state-court child-custody dispute.
2. Whether the plaintiff's assertion that he lacked access to a state forum warranted denying abstention or allowing amendment.
3. Whether the complaint should be dismissed without leave to amend and without prejudice.

HOLDINGS

1. A complaint that is at its core a child-custody or other domestic-relations dispute is subject to the domestic relations exception even when it asserts constitutional, 42 U.S.C. § 1983, 42 U.S.C. § 1981, conspiracy, or tort claims against numerous defendants.
2. The plaintiff's unsupported assertion that he was barred from state court did not defeat abstention because the cited letter did not establish that he lacked access to state-court litigation or remedies.
3. Dismissal without leave to amend was appropriate, but the dismissal was without prejudice to Chima bringing suit in an appropriate forum.

KEY QUOTATIONS

"The domestic relations exception applies to cases that "while raising constitutional issues, [are at their] core [] child custody dispute[s]." (at 1)

"Accordingly, Chima is not left without a state forum and abstention is appropriate." (at 2)

"The case is DISMISSED without leave to amend but also without prejudice to Mr. Chima bringing suit in an appropriate forum." (at 3–4)

FACTUAL BACKGROUND

Chikodi Chima sued 26 defendants, including attorneys, social workers, police officers, private parties, companies, and the City and County of San Francisco, based on alleged fraud, conspiracy, false evidence, and false testimony in state-court custody proceedings. Chima acknowledged that his claims arose from a family-law matter and custody determinations. He argued that a letter from a state-court administrative official showed that he was barred from pursuing relief in state court, but the district court found that the letter addressed only the proper channel for complaints concerning sheriff's personnel and did not show that Chima lacked access to a state forum.

PROCEDURAL HISTORY

Chikodi Chima, proceeding pro se, filed claims against numerous defendants arising from state-court custody litigation. Magistrate Judge Thomas S. Hixson screened the Second Amended Complaint under 28 U.S.C. § 1915(e) and recommended dismissal without leave to amend because the claims were at their core a domestic-

relations dispute. After Chima timely objected, the district court adopted the report and recommendation and dismissed the case without leave to amend and without prejudice to filing in an appropriate forum.

DISPOSITION

dismissed

CASES CITED

- Chima v. Perkins, 2025 WL 3182071, at *1 (N.D. Cal. Nov. 5, 2025)
- Coats v. Woods, 819 F.2d 236, 237 (9th Cir. 1987)
- Caetano v. Santa Clara County, No. C-02-1191 PJH, 2002 WL 1677723, at *5 (N.D. Cal. July 19, 2002)
- Csibi v. Fustos, 670 F.2d 134, 138 (9th Cir. 1982)

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