

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PRECEDENTIAL VALUE	unpublished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)

OPINION

1 2 3 4 5 IN THE UNITED STATES DISTRICT COURT 6 FOR THE NORTHERN DISTRICT
OF CALIFORNIA 7 8 CHIKODI CHIMA, Case No. 25-cv-10294-CRB 9 Plaintiff, ORDER
ADOPTING REPORT AND 10 v. RECOMMENDATION; DISMISSING CASE 11 CITY AND
COUNTY OF SAN FRANCISCO, et al., 12 Defendants. 13 The Court has been here before.

On November 5, 2025, the Court adopted a report 14 and recommendation from Magistrate Judge
Thomas S. Hixson dismissing a case brought 15 by pro se plaintiff Chikodi Chima. Chima v.
Perkins, 2025 WL 3182071, at *1 (N.D. Cal. 16 Nov. 5, 2025). There, he brought a suit against 88
defendants arising out of a custody 17 litigation in state court based on an alleged conspiracy
against him.

Id. And the Court 18 dismissed the case without leave to amend under the principle of abstention
in domestic 19 relations cases. Id. 20 Nevertheless, Chima again sues 26 defendants (many the
same as before)— 21 including lawyers, law firms, individuals who submitted statements in
support of his 22 former spouse, social workers, police, financial and insurance companies, the
City and 23 County of San Francisco, and others—in connection with the same custody litigation
in 24 state court.

See SAC (dkt. 11). Judge Hixson screened the Second Amended Complaint 25 pursuant to 28
U.S.C. § 1915(e) and issued a Report and Recommendation (“R&R”) 26 concluding that the
complaint failed to state a claim on which relief could be granted. See 27 R&R (dkt. 12). Again,
Judge Hixson recommended that the complaint be dismissed 1 without leave to amend based on
abstention principles.

Id. at 1–2. Chima filed a timely 2 objection to the R&R. See Obj. (dkt. 15). 3 The Court has
carefully reviewed the relevant materials and finds the R&R to be 4 thorough, correct, and well-
reasoned—functionally the same grounds as before.

The R&R 5 concluded that the complaint should “be dismissed because it is at its core a domestic 6 relations dispute subject to abstention.” R&R at 5 (quoting *Chima*, 2025 WL 3182071 at 7 *1). The domestic relations exception applies to cases that “while raising constitutional 8 issues, [are at their] core [] child custody dispute[s].” R&R at 3–4 (quoting *Coats v. 9 Woods*, 819 F.2d 236, 237 (9th Cir.

1987)). Even where a complaint brings section 1983 10 and section 1981 claims, and even where it alleges “a massive conspiracy by judges, 11 legislators, attorneys, and a court psychologist,” if it is essentially about a custody dispute, 12 it is subject to the domestic relations exception. See R&R at 4–5 (quoting *Caetano v. 13 Santa Clara County*, No. C-02-1191 PJH, 2002 WL 1677723, at *5 (N.D.

Cal. July 19, 14 2002)). 15 Just like last time, Chima concedes that his wide-reaching conspiracy claims arise 16 from a “family law matter and custody determinations.” Obj. at 2. Indeed, Chima’s 17 conspiracy is centered on an alleged scheme to commit fraud against him by presenting 18 false evidence and testimony in his state proceedings. See SAC ¶¶ 36–49.

Accordingly, 19 the Court agrees with Judge Hixson that “the proper place to bring [Chima’s] challenges 20 [is] in California courts, not federal court.” R&R at 6. Just because Chima included 21 claims that could be actionable between other private parties does not take the complaint 22 outside of the domestic relations exception. See *Csibi v. Fustos*, 670 F.2d 134, 138 (9th 23 Cir.

1982) (holding even where the complaint included a tort claim for wrongful 24 interference with inheritance that “the primary issue is still the marital status” and that if a 25 party could escape the domestic relations exception “by pleading an independent tort,” 26 then “a clever pleader” could bring “child and spousal support matters... into federal 27 court.”).

Nor does the inclusion of additional individuals mean that the case is not at its 1 cv-04570-EMC (JSC), 2021 WL 3610324, at *2 (N.D. Cal. June 23, 2021) (holding— 2 where plaintiff alleged “that she was denied access to the court proceedings wherein her 3 parental rights were terminated, that evidence in those proceedings was falsified, and that 4 she was ‘cut off’ from the process,” and that she was “mistreated and abused by the entire 5 legal system,” and sued Child Protective Services, the Sonoma County Superior Court, and 6 four individuals—that the domestic relations exception applied).

7 In an effort to avoid this outcome, Chima asserts that he is completely barred from 8 pursuing his concerns in state court. Obj. at 4. To support his argument, Chima points to a 9 letter by Brandon Riley, the San Francisco County Superior Court’s Chief Executive 10 Officer, that purportedly demonstrates he was “physically blocked from accessing the 11 courthouse.” Id. at 2.

It does no such thing. In that letter, Riley simply notes that the 12 administrative office of the court “does not have oversight of complaints involving the San 13 Francisco Sheriff’s Office or its

deputies.” Id. Ex. A. Riley advised Chima to “direct [his] 14 complaint to the San Francisco Sheriff’s Office.” Id. The letter says nothing about Chima 15 being unable to physically access the courthouse or pursue litigation there.

It merely 16 explains that the court’s administrative office does not manage complaints about individual 17 sheriffs. The letter also fails to mention an inability to remedy harm from all the other 18 defendants listed in the case.

Accordingly, Chima is not left without a state forum and 19 abstention is appropriate.¹ 20 21 22 23 // 24 // 25 26 1 Chima also points to Riley’s letter as a basis for permitting amendment of his pleadings, as it 27 demonstrates he was “denied any forum in which to adjudicate constitutional violations arising from the use of state judiciary machinery.” Obj. at 4–5.

But the Court agrees with Judge Hixson 1 Because the R&R correctly concluded that the complaint “is at its core a domestic 2 || relations dispute,” see R&R at 6, the Court ADOPTS the R&R in all respects. The case is 3. || DISMISSED without leave to amend but also without prejudice to Mr. Chima bringing suit 4 || in an appropriate forum. 5 IT ISSO ORDERED. 6 Dated: January 6, 2026 L EK —_ CHARLES R. BREYER 7 United States District Judge 8 9 10 11 12 14 15 16 Zz 19 20 21 22 23 24 25 26 27 28