

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Peterson v. Sacramento Department of Child Support Services

Peterson · No. 2:24-cv-2759-DAD-JDP (PS) · Decided July 29, 2025

SUMMARY

The court dismisses Desiree Peterson’s complaint against the Sacramento Department of Child Support Services with leave to amend. Peterson alleged that the department submitted a fraudulent proof of service in state family court proceedings, resulting in an improper child support obligation. The court concludes that her claims are barred by the Rooker-Feldman doctrine and grants leave to file an amended complaint within thirty days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 29, 2025
DOCKET	2:24-cv-2759-DAD-JDP (PS)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening order on a pro se complaint filed by a plaintiff seeking to proceed in forma pauperis under 28 U.S.C. § 1915(e).
STANDARD OF REVIEW	The court screened the in-forma-pauperis complaint under 28 U.S.C. § 1915(e)(2) and applied the pleading standards of Federal Rule of Civil Procedure 8(a)(2) and the plausibility standard under Twombly and Iqbal. The pro se pleading was construed liberally, but the court could not supply essential elements not pleaded.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Desiree Peterson v. Sacramento Department of Child Support Services

TOPICS

- child support
- subject matter jurisdiction
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal district court had jurisdiction to review or invalidate the state-court child-support order and award reimbursement for payments made under that order.
2. Whether plaintiff's allegation that the defendant submitted a fraudulent proof of service established an extrinsic-fraud exception to the Rooker-Feldman doctrine.
3. Whether the complaint stated a cognizable claim under the federal pleading and in-forma-pauperis screening standards.

HOLDINGS

1. The claims seeking to invalidate the state-court child-support order and obtain reimbursement for payments made under that order were barred by the Rooker-Feldman doctrine because they sought redress for an injury allegedly caused by the state-court judgment.
2. The complaint did not sufficiently allege extrinsic fraud because plaintiff presented her fraud-related argument to the state court and received a hearing on her child-support obligations.
3. The complaint failed to state a claim and was dismissed with leave to amend.

KEY QUOTATIONS

"This court does not have jurisdiction to review the state court decision on child support payments." (at 2)

"The law does not allow a federal court to review the child support orders created by a state court." (at 2)

"Therefore, plaintiff's claims are barred by the Rooker-Feldman doctrine." (at 3)

"Accordingly, plaintiff's complaint is dismissed for failure to state a claim." (at 3)

FACTUAL BACKGROUND

Plaintiff attended a July 3, 2023 state family-law hearing concerning her child-support obligations. She alleged that the Sacramento Department of Child Support Services submitted a fraudulent proof of service bearing the signature of Deborah Hamm, whom plaintiff determined had not worked for the department since 2019. Plaintiff asserted that the allegedly fraudulent proof of service led to an order requiring child-support payments and income withholding, although she acknowledged presenting her fraud and paperwork-related arguments to the state court and having a hearing.

PROCEDURAL HISTORY

Plaintiff filed a civil-rights complaint alleging that the Sacramento Department of Child Support Services submitted a fraudulent proof of service during a state family-law proceeding, resulting in an allegedly improper child-support obligation and income withholding. The court granted leave to proceed in forma pauperis, screened the complaint, found that the claims were barred by the Rooker-Feldman doctrine and failed to state a

claim, dismissed the complaint with leave to amend, and directed plaintiff either to file an amended complaint or voluntarily dismiss within thirty days.

DISPOSITION

dismissed

CASES CITED

- D.C. Court of Appeals v. Feldman, 460 U.S. 462, 483 n.16, 486 (1983)
- Bianchi v. Rylaarsdam, 334 F.3d 895, 898 (9th Cir. 2003)
- Bell v. City of Boise, 709 F.3d 890, 897 (9th Cir. 2013)
- Collins v. Grisom, No. 21-CV-2136 JLS (DEB), 2022 WL 3325665, at *3 (S.D. Cal. Aug. 11, 2022)
- Nemcik v. Mills, No. 16-CV-00322-BLF, 2016 WL 4364917, at *6 (N.D. Cal. Aug. 16, 2016)
- Rucker v. County of Santa Clara, State of California, No. C02-5981 JSW, 2003 WL 21440151, at *2 (N.D. Cal. June 17, 2003)
- Kougasian v. TMSL, Inc., 359 F.3d 1136, 1140-41 (9th Cir. 2004)
- Davis v. Davis, No. 18-cv-00094-RS, 2018 WL 3069308, at *5 (N.D. Cal. Apr. 25, 2018)
- Noel v. Hall, 341 F.3d 1148, 1164 (9th Cir. 2003)
- Wood v. McEwen, 644 F.2d 797, 801 (9th Cir. 1981)
- Lacey v. Maricopa County, 693 F.3d 896, 907 n.1 (9th Cir. 2012) (en banc)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Hayes v. Idaho Correctional Center, 849 F.3d 1204, 1208 (9th Cir. 2017)
- Bruns v. National Credit Union Administration, 122 F.3d 1251, 1257 (9th Cir. 1997)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Kobold v. Good Samaritan Regional Medical Center, 832 F.3d 1024, 1038 (9th Cir. 2016)
- Nagrampa v. MailCoups, Inc., 469 F.3d 1257, 1264 n.2 (9th Cir. 2006) (en banc)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)