

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Peter Jason Helfrich v. Donald Trump, JD Vance, and Elon Musk

Helfrich v. Trump · No. 2:25-cv-0593 TLN AC PS · Decided April 3, 2025

SUMMARY

The Eastern District of California grants the pro se plaintiff’s motion to proceed in forma pauperis and denies his motion for electronic filing. The magistrate judge recommends dismissal without leave to amend, concluding that the complaint improperly seeks removal of a state-court action, fails to state claims against a private individual and court staff, and is barred in part by judicial or quasi-judicial immunity.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 3, 2025
DOCKET	2:25-cv-0593 TLN AC PS
DISPOSITION	other
PROCEDURAL POSTURE	A pro se plaintiff filed an action, sought leave to proceed in forma pauperis, and filed a First Amended Complaint asserting claims under 42 U.S.C. § 1983 and the Americans with Disabilities Act. A magistrate judge granted in forma pauperis status, denied or resolved ancillary motions, screened the amended complaint under 28 U.S.C. § 1915(e)(2), and issued findings and recommendations that the action be dismissed without leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court screens an in forma pauperis complaint and must dismiss it if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The court accepts factual allegations as true unless clearly baseless or fanciful, construes them in the plaintiff's favor, applies the plausibility standard, and gives pro se pleadings liberal construction.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

civil procedure

pleadings

section 1983

ada / disability

motions to dismiss

PRACTICE AREAS

civil procedure

civil rights

constitutional law

disability law

QUESTIONS PRESENTED

1. Whether the First Amended Complaint stated a claim under 42 U.S.C. § 1983 or the ADA against a private individual whose alleged conduct was private.
2. Whether a plaintiff may remove to federal court a state-court action that the plaintiff originally filed.
3. Whether judicial and quasi-judicial immunity barred claims against Yuba County Superior Court judges and court staff for conduct associated with adjudicating or processing the state-court action.
4. Whether allegations that unnamed court clerks generally mishandled documents and engaged in misconduct stated a plausible claim.
5. Whether the pleading defects could be cured by amendment.

HOLDINGS

1. A private individual who engaged only in private conduct does not act under color of state law and therefore cannot be held liable under § 1983 for alleged constitutional violations.
2. The complaint did not state an ADA claim against Cable because it did not allege facts showing that Cable was subject to the asserted ADA provisions or identifying specific ADA-related misconduct.
3. A plaintiff may not remove to federal court a civil action that the plaintiff originally brought in state court; removal is limited to defendants.
4. Judges are absolutely immune from claims based on acts performed in their judicial functions, and court staff receive quasi-judicial immunity when acting in a judicial or quasi-judicial capacity.
5. General allegations that unidentified court clerks mishandled documents or engaged in misconduct do not state a plausible claim without identifying the individuals and specifying the acts attributed to them.
6. Dismissal without leave to amend was appropriate because the defects in the complaint could not be cured by adding additional facts.

KEY QUOTATIONS

“Purely private conduct, no matter how wrongful, is not actionable under § 1983.” (at 3)

“The ability to remove a case from state court is therefore limited to defendants.” (at 4)

“The same absolute immunity, called “quasi-judicial immunity,” extends to court staff when they act in a judicial or quasi-judicial capacity.” (at 5)

“The complaint does not contain sufficient factual matter to state a plausible claim for relief against court staff.” (at 6)

FACTUAL BACKGROUND

Plaintiff alleged that Gary Cable fraudulently sold him a non-operational bus, later submitted false affidavits, sabotaged the bus, and took approximately \$180 of personal property. Plaintiff had filed a related action in Yuba County Superior Court and alleged that judges and clerks mishandled the case, failed to recognize defaults, acted with bias, and failed to accommodate his disabilities. He sought removal of the state case to federal court, damages, declaratory relief, injunctive relief, and ADA accommodations.

PROCEDURAL HISTORY

Plaintiff filed an initial complaint and an in forma pauperis motion on February 20, 2025. He then filed a motion for leave to amend and a First Amended Complaint; because amendment was permitted as of right, the court denied the motion as moot and treated the First Amended Complaint as operative. The magistrate judge recommended dismissal after screening and advised that the district judge would make the final decision.

DISPOSITION

other

CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Neitzke v. Williams, 490 U.S. 319, 327 (1989)
- Von Saher v. Norton Simon Museum of Art at Pasadena, 592 F.3d 954, 960 (9th Cir. 2010), cert. denied, 564 U.S. 1037 (2011)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Western Mining Council v. Watt, 643 F.2d 618, 624 (9th Cir. 1981)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-57 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Noll v. Carlson, 809 F.2d 1446, 1448 (9th Cir. 1987), superseded on other grounds by statute as stated in Lopez v. Smith, 203 F.3d 1122 (9th Cir. 2000) (en banc)
- Gomez v. Toledo, 446 U.S. 635, 640 (1980)
- Ouzts v. Maryland Nat'l Ins. Co., 505 F.2d 547, 559 (9th Cir. 1974)
- Van Ort v. Estate of Stanewich, 92 F.3d 831, 835 (9th Cir. 1996)
- Lovell v. Chandler, 303 F.3d 1039, 1052 (9th Cir. 2002)
- Shamrock Oil & Gas Corp. v. Sheets, 313 U.S. 100, 104-05 (1941)
- Stahl v. Klotz, 440 F. Supp. 3d 1113, 1119 (E.D. Cal. 2020)
- Howard v. Drapkin, 222 Cal. App. 3d 843, 852 (1990)
- In re Castillo, 297 F.3d 940, 951 (9th Cir. 2002)
- Lopez v. Smith, 203 F.3d 1122, 1130-31 (9th Cir. 2000) (en banc)

- Cato v. United States, 70 F.3d 1103, 1105-06 (9th Cir. 1995)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Ylst, 951 F.2d 1153, 1156-57 (9th Cir. 1991)

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