

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wooten v. Trump

No. 2:25-cv-0873 DC AC (PS) · No. No. 2:25-cv-0873 DC AC (PS) · Decided April 23, 2025

SUMMARY

The magistrate judge recommends dismissing Robert Wooten’s action against President Donald J. Trump for lack of subject-matter jurisdiction. The recommendation concludes that the plaintiff lacks Article III standing because his alleged injuries are speculative and that claims seeking removal of the President or preemptive restriction of executive orders present nonjusticiable political questions. The recommendation also rejects the plaintiff’s arguments challenging the legal basis of subject-matter jurisdiction and standing.

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 23, 2025
DOCKET	No. 2:25-cv-0873 DC AC (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations by a magistrate judge recommending dismissal of the action for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The court independently examined whether subject-matter jurisdiction existed under Federal Rule of Civil Procedure 12(h)(3).
PRECEDENTIAL VALUE	Unknown; findings and recommendations, with no reporter citation.
PARTIES	Robert Wooten v. Donald J. Trump

TOPICS

- subject matter jurisdiction
- standing
- civil procedure
- separation of powers
- constitutional law

PRACTICE AREAS

- civil procedure
- constitutional law
- federal employment law
- administrative law

QUESTIONS PRESENTED

1. Whether plaintiff established Article III standing to challenge the alleged executive actions and policies.
2. Whether the claims presented a nonjusticiable political question concerning the President's fitness for office, removal, or policy decisions.
3. Whether the court was required to dismiss the action for lack of subject-matter jurisdiction.

HOLDINGS

1. Plaintiff failed to establish Article III standing because the First Amended Complaint did not allege a concrete and particularized injury that was actual or imminent, fairly traceable to the challenged conduct, and likely to be redressed by the requested relief.
2. To the extent plaintiff sought to remove the President from office or preemptively prevent executive orders implementing policy objectives, those claims presented political questions committed to Congress or the Executive Branch and were not subject to judicial review.
3. The action should be dismissed for lack of subject-matter jurisdiction because plaintiff lacked standing and the challenged requests were barred by the political question doctrine.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction.” (at 2)

“The question of whether the President is fit for office and subject to removal is a political question categorically excluded from judicial review.” (at 4)

FACTUAL BACKGROUND

Plaintiff alleged that federal employees had been improperly fired, that government benefits were threatened by President Trump's executive orders, and that the creation of the Department of Government Efficiency and appointment of Elon Musk violated the Constitution and separation of powers. He sought relief under the First Amendment's Petition Clause and appeared to seek protection against executive actions and possibly removal of the President from office. The amended complaint did not identify a concrete, particularized, actual, or imminent personal injury.

PROCEDURAL HISTORY

Plaintiff filed the action pro se on March 17, 2025, and later filed a First Amended Complaint seeking a temporary restraining order and preliminary injunction. After reviewing the amended pleading, the magistrate judge issued an order to show cause regarding subject-matter jurisdiction. Plaintiff responded, but the magistrate judge concluded that plaintiff lacked standing and that the claims also presented a nonjusticiable political question, and recommended dismissal.

DISPOSITION

other

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Home Depot U.S.A., Inc. v. Jackson, 139 S. Ct. 1743, 1746 (2019)
- Rainero v. Archon Corp., 844 F.3d 832, 841 (9th Cir. 2016)
- Arbaugh v. Y&H Corp., 546 U.S. 500, 514 (2006)
- Chandler v. State Farm Mutual Automobile Insurance Co., 598 F.3d 1115, 1121-22 (9th Cir. 2010)
- Corrie v. Caterpillar, Inc., 503 F.3d 974, 982 (9th Cir. 2007)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 560-61 (1992)
- Schlesinger v. Reservists Committee to Stop the War, 418 U.S. 208, 217 (1974)
- United States v. Richardson, 418 U.S. 166, 173-78 (1974)
- Drake v. Obama, 664 F.3d 774, 779-84 (9th Cir. 2011)
- Baker v. Carr, 369 U.S. 186, 217 (1962)
- Japan Whaling Ass'n v. American Cetacean Society, 478 U.S. 221, 230 (1986)
- Flast v. Cohen, 392 U.S. 83, 95 (1968)
- Nixon v. United States, 506 U.S. 224, 229, 233-35 (1993)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Ylst, 951 F.2d 1153, 1156-57 (9th Cir. 1991)