

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Alexandre Zdenek Davis II v. The State of Idaho, The Ada County
Public Defenders Office, Ada County Sheriff Department

Davis II v. State of Idaho · No. 1:25-cv-00544-BLW · Decided June 9, 2026

SUMMARY

The United States District Court for the District of Idaho screened Alexandre Zdenek Davis II’s pro se prisoner civil rights complaint concerning pending Idaho criminal charges, an outstanding warrant, and alleged speedy-trial violations. The court concluded that the speedy-trial issues must be pursued in state court through appointed counsel and that the State of Idaho is protected from the asserted federal claims by sovereign immunity and other jurisdictional limits. The case was dismissed without prejudice, and the plaintiff’s pending motions were denied or granted as moot.

CASE DETAILS

COURT	United States District Court for the District of Idaho
JURISDICTION	United States District Court for the District of Idaho
DECIDED	June 9, 2026
DOCKET	1:25-cv-00544-BLW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial screening of a pro se federal prisoner's civil-rights complaint under the Prison Litigation Reform Act, followed by dismissal without prejudice.
STANDARD OF REVIEW	Screening under 28 U.S.C. §§ 1915 and 1915A to determine whether a pro se prisoner complaint states a claim upon which relief can be granted.
PRECEDENTIAL VALUE	Unpublished district-court screening order; nonprecedential
PARTIES	Alexandre Zdenek Davis II v. The State of Idaho, The Ada County Public Defenders Office, Ada County Sheriff Department

TOPICS

- speedy trial
- section 1983
- sovereign immunity
- civil procedure
- criminal procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff's federal civil-rights action could provide relief concerning the alleged delay in his pending Idaho criminal prosecution and speedy-trial claim.
2. Whether the State of Idaho was subject to suit under 42 U.S.C. § 1983 in federal court.
3. Whether the federal district court had jurisdiction to issue mandamus relief directing a state court to act.
4. Whether the action should be dismissed without prejudice at the PLRA screening stage.

HOLDINGS

1. The speedy-trial question concerning Plaintiff's pending Idaho criminal case must be determined in the Idaho state district court, and Plaintiff must follow that court's procedures for represented litigants and requests to proceed pro se.
2. The State of Idaho and its state entities are immune from Plaintiff's § 1983 suit in federal court because Idaho has not waived its sovereign immunity and Congress has not validly abrogated it for such suits; the State also is not a person subject to suit under § 1983.
3. The federal district court lacks jurisdiction to issue a writ of mandamus requiring a state court to take action.

KEY QUOTATIONS

“This Court agrees that the speedy trial question must be determined in the state district court.”

“In addition, as to the State of Idaho as a defendant in this case, the Eleventh Amendment provides “sovereign immunity” to states and state entities.”

FACTUAL BACKGROUND

Plaintiff, a federal prisoner at FCI Leavenworth, was charged in Idaho with felony grand theft in state criminal case CR01-21-43142, and an arrest warrant remained outstanding. Idaho had not lodged a detainer because of jurisdictional issues, and Plaintiff had appointed counsel whose identity had changed several times. Plaintiff sought to proceed pro se and asserted that the unresolved criminal case violated his speedy-trial rights, but the state court instructed him to pursue those matters through appointed counsel.

PROCEDURAL HISTORY

Plaintiff filed a civil-rights complaint concerning unresolved Idaho criminal charges, an outstanding warrant, and alleged speedy-trial and representation-related issues. The Court requested supplemental information from Ada County prosecutors and reviewed that information, Plaintiff's complaint, and pending motions. The Court dismissed the action without prejudice and denied or resolved the pending motions as moot.

DISPOSITION

dismissed

CASES CITED

- Smith v. Hooey, 393 U.S. 374, 377 (1969)
- Lawrence v. Blackwell, 298 F. Supp. 708, 715-16 (N.D. Ga. 1969)
- Hans v. Louisiana, 134 U.S. 1, 16-18 (1890)
- Kimel v. Fla. Bd. of Regents, 528 U.S. 62, 73 (2000)
- Pennhurst State Sch. & Hosp. v. Halderman, 465 U.S. 89, 100 (1984)
- Will v. Mich. Dep't of State Police, 491 U.S. 58, 71 (1989)
- Demos v. U.S. Dist. Court, E. Dist. of Wash., 925 F.2d 1160, 1161 (9th Cir. 1991)

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