

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sandy Holt v. Sgt. Forsyth #221, et al.

No. 2:24-cv-03256-DJC-CSK (E.D. Cal. Sept. 16, 2025) · No. 2:24-cv-03256-DJC-CSK · Decided September 16, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Sandy Holt’s First Amended Complaint under 28 U.S.C. § 1915(e). The court found that the Fourth Amendment unlawful-search-and-seizure claim concerning the impoundment of Holt’s vehicle was sufficient to proceed, but dismissed the cruel-and-unusual-punishment and Fourteenth Amendment falsification-of-records claims with leave to amend. The order gives Holt thirty days either to proceed on the Fourth Amendment claim alone or to file a Second Amended Complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 16, 2025
DOCKET	2:24-cv-03256-DJC-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prison-like civil rights complaint filed in forma pauperis under 28 U.S.C. § 1915(e)(2)(B). The court reviewed Plaintiff’s First Amended Complaint, permitted the Fourth Amendment unlawful-search-and-seizure claim to proceed, and dismissed the cruel-and-unusual-punishment and falsification-of-records claims with leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis action that is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The court accepts well-pleaded factual allegations as true, construes them in the plaintiff’s favor, liberally construes pro se pleadings, and disregards conclusory allegations, unreasonable inferences, and unwarranted factual deductions.

PRECEDENTIAL VALUE	unpublished
PARTIES	Sandy Holt v. Sgt. Forsyth #221, Sacramento County Deputy Higley #473

TOPICS

section 1983 civil rights pleadings due process constitutional law

PRACTICE AREAS

civil rights constitutional law civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's allegations plausibly stated a 42 U.S.C. § 1983 Fourth Amendment claim for unlawful search and seizure of her vehicle.
2. Whether Plaintiff adequately alleged a separate Fourteenth Amendment procedural due process claim concerning the vehicle seizure.
3. Whether Plaintiff's allegations stated an Eighth Amendment cruel-and-unusual-punishment claim.
4. Whether Plaintiff adequately alleged a Fourteenth Amendment deliberate-fabrication-of-evidence claim based on allegedly falsified official records.
5. Whether the deficient claims should be dismissed with leave to amend.

HOLDINGS

1. The First Amended Complaint sufficiently stated a Fourth Amendment unlawful-search-and-seizure claim for screening purposes because Plaintiff alleged that Defendants seized her vehicle and falsified information to justify the seizure.
2. The procedural due process claim was inadequately pleaded and was dismissed with leave to amend because Plaintiff did not clearly identify the procedural protection to which she was entitled or allege facts connecting Defendants to the asserted deprivation.
3. Plaintiff failed to state an Eighth Amendment cruel-and-unusual-punishment claim because the First Amended Complaint did not allege that she was a prisoner, arrested, or pretrial detainee at the time of the incident; the claim was dismissed with leave to amend.
4. Plaintiff failed to state a Fourteenth Amendment deliberate-fabrication-of-evidence claim because she did not allege that Defendants' alleged fabrication caused a deprivation of liberty or subjected her to criminal charges based on false evidence; the claim was dismissed with leave to amend.
5. The deficient claims were dismissed with leave to amend because a pro se litigant generally must receive notice of pleading deficiencies and an opportunity to amend unless the deficiencies cannot be cured.

KEY QUOTATIONS

“Pursuant to 28 U.S.C. § 1915(e), the court must screen every in forma pauperis proceeding, and must order dismissal of the case if it is “frivolous or malicious,” “fails to state a claim on which relief may be granted,” or “seeks monetary relief against a defendant who is immune from such relief.”” (Opinion at 1)

“To state a claim on which relief may be granted, the plaintiff must allege enough facts “to state a claim to relief that is plausible on its face.”” (Opinion at 3)

“This cause of action as pled is sufficient for screening purposes to require Defendants to respond to Plaintiff’s Fourth Amendment cause of action.” (Opinion at 4)

“The prohibition of cruel and unusual punishment under the Eighth Amendment applies only after conviction and sentencing.” (Opinion at 5)

“To state a Section 1983 claim of deliberate fabrication, a plaintiff must plead sufficient facts to allege that (1) the defendant official deliberately fabricated evidence and (2) the deliberate fabrication caused the plaintiff’s deprivation of liberty.” (Opinion at 6)

FACTUAL BACKGROUND

Plaintiff alleged that Sacramento County officers seized her 2007 Dodge Charger on December 23, 2023, while it was parked on private property. She claimed the officers acted without legal justification, ignored her statement that she would move the vehicle within the property manager's 72-hour notice period, and falsified information to justify the seizure. She also alleged that the officers failed to conduct an inventory and that one defendant had engaged in a prior allegedly unlawful towing incident involving her vehicle.

PROCEDURAL HISTORY

The court granted Plaintiff leave to proceed in forma pauperis and dismissed her original complaint with leave to amend on April 25, 2025. Plaintiff filed a First Amended Complaint on May 22, 2025. Following statutory screening, the court ordered that the Fourth Amendment claim was sufficient to proceed, dismissed the other two claims with leave to amend, and gave Plaintiff thirty days either to elect to proceed on the surviving claim or file a second amended complaint.

DISPOSITION

other

CASES CITED

- *Lopez v. Smith*, 203 F.3d 1122 (9th Cir. 2000) (en banc)
- *Neitzke v. Williams*, 490 U.S. 319 (1989)
- *Von Saher v. Norton Simon Museum of Art at Pasadena*, 592 F.3d 954 (9th Cir. 2010), cert. denied, 564 U.S. 1037 (2011)
- *Hebbe v. Pliler*, 627 F.3d 338 (9th Cir. 2010)
- *Western Mining Council v. Watt*, 643 F.2d 618 (9th Cir. 1981)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)

- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Cahill v. Liberty Mutual Insurance Co.*, 80 F.3d 336 (9th Cir. 1996)
- *Wilder v. Virginia Hospital Association*, 496 U.S. 498 (1990)
- *Albright v. Oliver*, 510 U.S. 266 (1994)
- *Florer v. Congregation Pidyon Shevuyim, N.A.*, 639 F.3d 916 (9th Cir. 2011)
- *Hansen v. Black*, 885 F.2d 642 (9th Cir. 1989)
- *Johnson v. Duffy*, 588 F.2d 740 (9th Cir. 1978)
- *Mapp v. Ohio*, 367 U.S. 643 (1961)
- *Miranda v. City of Cornelius*, 429 F.3d 858 (9th Cir. 2005)
- *Carroll v. United States*, 267 U.S. 132 (1925)
- *Brewster v. Board of Education of Lynwood Unified School District*, 149 F.3d 971 (9th Cir. 1998)
- *Lee v. City of Los Angeles*, 250 F.3d 668 (9th Cir. 2001)
- *Mendiola-Martinez v. Arpaio*, 836 F.3d 1239 (9th Cir. 2016)
- *Byrd v. Maricopa County Board of Supervisors*, 845 F.3d 919 (9th Cir. 2017)
- *Devereaux v. Abbey*, 263 F.3d 1070 (9th Cir. 2001)
- *Orcutt v. Pelletier*, 2023 WL 3735584 (9th Cir. May 31, 2023)
- *Spencer v. Peters*, 857 F.3d 789 (9th Cir. 2017)
- *McHenry v. Renne*, 84 F.3d 1172 (9th Cir. 1996)
- *Lacey v. Maricopa County*, 693 F.3d 896 (9th Cir. 2012)