

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Smiley James Harris, A.R. v. U. S. Dept. of Justice, et al.

Harris · No. 25-cv-07664-RS · Decided December 3, 2025

SUMMARY

The United States District Court for the Northern District of California granted defendants’ motion to dismiss Smiley James Harris’s pro se complaint against various federal, state, and local government entities. The court held that the complaint failed to provide sufficient factual allegations or a cognizable legal theory, and that claims were also barred by Heck v. Humphrey, immunities, and applicable statutes of limitations. Dismissal was without leave to amend because amendment would be futile.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Richard Seeborg
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 3, 2025
DOCKET	25-cv-07664-RS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved to dismiss a pro se complaint under Federal Rules of Civil Procedure 8(a)(2) and 12(b)(6). The district court granted the motion and denied leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court tests the legal sufficiency of the complaint, accepts material allegations as true, and construes them in the light most favorable to the nonmoving party; conclusory allegations and unwarranted inferences are insufficient.
PRECEDENTIAL VALUE	Unknown
PARTIES	Smiley James Harris, A.R. v. U. S. Dept. of Justice, California Department of Justice, State of California, California Department of Motor Vehicles, County of Lake, City of Clearlake, Clearlake Police Department

TOPICS

motions to dismiss

pleadings

section 1983

statute of limitations

eleventh amendment immunity

PRACTICE AREAS

Civil procedure

Civil rights

Constitutional law

Federal courts

Remedies

QUESTIONS PRESENTED

1. Whether the complaint contained sufficient factual allegations and a cognizable legal theory to satisfy Federal Rule of Civil Procedure 8(a)(2) and survive Rule 12(b)(6).
2. Whether damages claims based on allegedly unconstitutional convictions or imprisonments were barred by *Heck v. Humphrey*.
3. Whether claims based on prosecutorial conduct were barred by the Eleventh Amendment and absolute prosecutorial immunity.
4. Whether claims under 42 U.S.C. §§ 1983, 1985(3), and 1986 were barred by the applicable statute of limitations.
5. Whether the Monell claims against Lake County stated a cognizable municipal-liability theory.
6. Whether amendment would be futile such that leave to amend should be denied.

HOLDINGS

1. The complaint failed to state a claim because it did not provide defendants fair notice, allege sufficient facts, or identify a cognizable legal theory.
2. Damages claims based on allegedly unconstitutional convictions or imprisonments are barred by *Heck v. Humphrey* unless the convictions or sentences have been reversed, expunged, declared invalid, or called into question by a writ of habeas corpus.
3. Claims based on prosecutorial action were barred by the Eleventh Amendment and absolute prosecutorial immunity.
4. Plaintiff's claims under 42 U.S.C. §§ 1983, 1985(3), and 1986 were time-barred under the applicable one-year limitations period.
5. The complaint did not state a cognizable Monell claim against Lake County because it appeared to rely on respondeat superior liability arising from court or district-attorney actions.
6. Leave to amend was properly denied because amendment would be futile.

KEY QUOTATIONS

“A complaint must contain “a short and plain statement of the claim showing that the pleader is entitled to relief.”” (at 2)

“A claim is facially plausible “when the pleaded factual content allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.”” (at 2)

“Plaintiff does no more than provide a series of superior court case numbers and make conclusory allegations.” (at 4)

“The foregoing analysis as well as Plaintiff’s past failures to state a claim upon which relief can be granted in substantially similar cases, see Case Nos. 3:25-cv-1587-JD and 25-cv-01594-JD, show that amendment would be futile.” (at 5)

FACTUAL BACKGROUND

Plaintiff sued the U.S. Department of Justice, California governmental entities, Lake County, the City of Clearlake, and the Clearlake Police Department. His allegations appeared to concern arrests and convictions between 2015 and 2022, which he characterized as false and maliciously prosecuted, as well as resulting incarceration and loss of a vehicle. He also asserted that defendants failed to recognize a commercial affidavit and a clarification-of-citizenship affidavit, and invoked 42 U.S.C. §§ 1983, 1985(3), and 1986, several criminal statutes, and constitutional amendments.

PROCEDURAL HISTORY

Plaintiff filed a pro se action alleging constitutional and statutory violations arising from arrests, convictions, incarceration, loss of a vehicle, and defendants' alleged failure to recognize affidavits. Defendants moved to dismiss. The court concluded that the complaint lacked fair notice, sufficient factual allegations, and a cognizable legal theory, and that several claims were independently barred by Heck, immunity doctrines, and statutes of limitations. Because plaintiff had previously failed to state claims in two substantially similar actions, the court found amendment futile and dismissed without leave to amend.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atlantic v. Twombly, 550 U.S. 544, 570 (2007)
- Parks Sch. of Bus., Inc. v. Symington, 51 F.3d 1480, 1484 (9th Cir. 1995)
- Balistreri v. Pacifica Police Dep’t, 901 F.2d 696, 699 (9th Cir. 1990)
- Epstein v. Wash. Energy Co., 83 F.3d 1136, 1140 (9th Cir. 1996)
- Heck v. Humphrey, 512 U.S. 477, 486-87 (1994)
- Cousins v. Lockyer, 568 F.3d 1063 (9th Cir. 2009)
- McMillian v. Monroe County, Ala., 520 U.S. 781 (1997)
- Weiner v. San Diego County, 210 F.3d 1025, 1031 (9th Cir. 2000)
- Bd. of Cnty. Comm’rs of Bryan Cnty., Okl. v. Brown, 520 U.S. 397, 403 (1997)
- Monell v. Dep’t of Social Servs., 436 U.S. 658, 665-83, 694 (1978)
- Saul v. United States, 928 F.2d 828, 843 (9th Cir. 1991)

- Wilson v. Garcia, 471 U.S. 261, 275-76 (1985)
- McDougal v. County of Imperial, 942 F.2d 668, 674 (9th Cir. 1991)
- Brown v. Pouncy, 93 F.4th 331 (5th Cir.), cert. denied, 145 S. Ct. 170, 220 L. Ed. 2d (2024)

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