

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Tremayne J. Reed v. State of Washington, et al.

Reed · No. C25-5687-KKE · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Washington adopted a magistrate judge’s Report and Recommendation and dismissed Tremayne J. Reed’s 42 U.S.C. § 1983 action with prejudice. The court held that the complaint was an impermissible de facto appeal of a state-court restitution order barred by the Rooker-Feldman doctrine, resulting in a lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3).

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Kymberly K. Evanson
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 23, 2026
DOCKET	C25-5687-KKE
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 civil-rights action challenging a state-court restitution order. After a magistrate judge recommended dismissal with prejudice for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3), the district court reviewed the recommendation and plaintiff's objections de novo and adopted the recommendation.
STANDARD OF REVIEW	De novo review of the complaint, the magistrate judge's Report and Recommendation, and the plaintiff's objections.
PRECEDENTIAL VALUE	unknown
PARTIES	Tremayne J. Reed v. State of Washington, et al.

TOPICS

- subject matter jurisdiction
- section 1983
- motions to dismiss
- civil rights
- civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether the district court had subject matter jurisdiction over Reed's § 1983 action challenging a state-court restitution order.
2. Whether the Rooker-Feldman doctrine barred the action as an impermissible de facto appeal from a state-court judgment.
3. Whether Reed's objections showed that his action concerned an independent access-to-courts injury rather than an attempt to obtain relief from the state-court judgment.

HOLDINGS

1. The district court lacked subject matter jurisdiction because Reed's complaint sought federal review or relief from a state-court decision.
2. The Rooker-Feldman doctrine is not limited to challenges to convictions or sentences; it also applies to a challenge to a state-court restitution order when the plaintiff seeks relief from that state-court decision.

KEY QUOTATIONS

“a “forbidden de facto appeal under Rooker-Feldman” because it “complains of a legal wrong allegedly committed by the state court, and seeks relief from the judgment of that court.”” (at 3)

“a state-court decision is not reviewable by lower federal courts.” (at 3)

“Plaintiff’s complaint (Dkt. No. 6) and this action are DISMISSED with prejudice under Federal Rule of Civil Procedure 12(h)(3) for lack of subject matter jurisdiction.” (at 3)

FACTUAL BACKGROUND

Reed's complaint challenged a restitution order and related legal financial obligations imposed in state court. The state trial court had remitted all non-restitution legal financial obligations, and Reed later filed a personal restraint petition in the Washington Court of Appeals, which rejected it. Reed sought federal relief under § 1983 against Washington state entities and officials, effectively asking the federal district court to review or invalidate the state-court decision.

PROCEDURAL HISTORY

Reed commenced the action on August 5, 2025, and was granted leave to proceed in forma pauperis. He filed a § 1983 complaint challenging restitution-related legal financial obligations and naming the State of Washington, the Washington Supreme Court and individual justices, and the Washington State Department of Corrections as defendants. Magistrate Judge Michelle L. Peterson ordered Reed to show cause why the case should not be dismissed under the Rooker-Feldman doctrine and later recommended dismissal with prejudice. The district court overruled Reed's objections, approved and adopted the Report and Recommendation, and dismissed the action with prejudice for lack of subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Cooper v. Ramos, 704 F.3d 772, 777 (9th Cir. 2012)
- Hooper v. Brnovich, 56 F.4th 619, 624 (9th Cir. 2022)
- Skinner v. Switzer, 562 U.S. 521, 532 (2011)
- Arellano v. Blahnik, 16-cv-2412-CAB (MSB), 2019 WL 2710527 (S.D. Cal. June 28, 2019)

OPINION

Reed

PER CURIAM.

1 2 3 4

5 UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

6 AT TACOMA

7 TREMAYNE J. REED,

8 Plaintiff, Case No. C25-5687-KKE 9 v.

ORDER DISMISSING ACTION

10 STATE OF WASHINGTON, et al., 11 Defendants. 12 Plaintiff Tremayne J. Reed, representing himself, commenced this action on August 5, 13 2025. Dkt. No. 1. The Honorable Michelle L. Peterson, United States Magistrate Judge, granted 14 Reed's application to proceed in forma pauperis, after which Reed filed a civil rights complaint 15 under 42 U.S.C. § 1983. Dkt. Nos. 5, 6. Reed's complaint asserts objections to a restitution order 16 entered against him, and names as defendants, the State of Washington, the Supreme Court of 17 Washington (and individual justices), and the Washington State Department of Corrections. See 18 Dkt. No. 6 at 3, 10–16. Judge Peterson subsequently ordered Reed to show cause as to why his 19 complaint should not be dismissed for lack of subject matter jurisdiction, explaining that under the 20 Rooker-Feldman doctrine, "federal district courts are without jurisdiction to hear direct appeals 21 from the judgments of state courts." Dkt. No. 7 at 3 (citing Cooper v. Ramos, 704 F.3d 772, 777 22 (9th Cir. 2012)). 23 1 Now before the Court are Judge Peterson's Report and Recommendation ("R&R") (Dkt.

2 No. 9) and Reed's objections (Dkt. No. 12). In her R&R, Judge Peterson recommended dismissing

3 the action with prejudice for lack of subject matter jurisdiction pursuant to Federal Rule of Civil 4 Procedure 12(h)(3). Dkt. No. 9. Judge Peterson explained that Reed's complaint amounted to "[a]

5 ‘forbidden de facto appeal under Rooker-Feldman’” because it “‘complains of a legal wrong 6
allegedly committed by the state court, and seeks relief from the judgment of that court.’” Id. at 3
7 (citing *Hooper v. Brnovich*, 56 F.4th 619, 624 (9th Cir. 2022)). 8 Though Reed filed objections
to Judge Peterson’s R&R, none are persuasive. Reed first 9 cites to *Arellano v. Blahnik*, 16-cv-
2412-CAB (MSB), 2019 WL 2710527 (S. D. Cal. June 28, 10 2019), among other cases, for the
proposition that § 1983 claims should be allowed to proceed 11 where they are “not based on a
theory that [the] conviction was invalid but on a theory that [the 12 defendant] violated [the
plaintiff’s] right of access to the courts.” Dkt. No. 12 at 2. Such arguments 13 are unavailing
where, as here, the record shows that Reed was in fact able to access the courts. As 14 Judge
Peterson pointed out, when Reed initially sought relief from his legal financial obligations 15
(“LFOs”), “[t]he trial court remitted all non-restitution LFOs[.]” Dkt. No. 9 at 2. Furthermore, 16
“[i]n February 2025, Plaintiff filed a personal restraint petition in the Washington Court of 17
Appeals,” which “[t]he Court of Appeals rejected[.]” Id. 18 Reed’s second argument—that
Rooker-Feldman does not apply here because it only bars 19 “overturning a conviction or
sentence”—fails because it is predicated on an overly narrow reading 20 of the doctrine. See Dkt.
No. 12 at 5. Indeed, as Judge Peterson explained, under Rooker-Feldman, 21 “a state-court
decision is not reviewable by lower federal courts.” *Hooper*, 56 F.4th at 624 (citing 22 *Skinner v.*
Switzer, 562 U.S. 521, 532 (2011)). 23 1 As such, the Court, having reviewed de novo Plaintiff’s
complaint, the Report and 2 Recommendation of the Honorable Michelle L. Peterson, United
States Magistrate Judge, and the 3 remaining record, hereby ORDERS: 4 (1) The Report and
Recommendation is approved and adopted. Dkt. No. 9. 5 (2) Plaintiff’s complaint (Dkt. No. 6) and
this action are DISMISSED with prejudice 6 under Federal Rule of Civil Procedure 12(h)(3) for
lack of subject matter jurisdiction. 7 (3) The Clerk is directed to send copies of this Order to
Plaintiff and to Judge 8 Peterson. 9 Dated this 23rd day of January, 2026. 10 11 A 12 Kymberly K.
Evanson United States District Judge 13 14 15 16 17 18 19 20 21 22 23