UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Mozafar Maghsoudnia, et al. v. Citibank, N.A. (National Association)

Maghsoudnia · No. 25-cv-06526-NW · Decided January 22, 2026

SUMMARY

The United States District Court for the Northern District of California granted Citibank, N.A.'s motion to dismiss for lack of personal jurisdiction. The court held that Citibank was not subject to general jurisdiction in California and that the plaintiffs had not alleged facts establishing specific jurisdiction. The court also denied jurisdictional discovery and directed the Clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Noél Wise
JURISDICTION	United States District Court for the Northern District of California
DECIDED	January 22, 2026
DOCKET	25-cv-06526-NW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs brought claims under California Commercial Code § 11207(b) and for declaratory relief. Defendant moved to dismiss under Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and the court granted the motion under Rule 12(b)(2) for lack of personal jurisdiction.
STANDARD OF REVIEW	On a motion to dismiss for lack of personal jurisdiction decided without an evidentiary hearing, the plaintiff must make a prima facie showing of jurisdictional facts. Uncontroverted allegations are accepted as true, and factual disputes in affidavits and declarations are resolved in the plaintiff's favor.
PRECEDENTIAL VALUE	Unknown
PARTIES	Mozafar Maghsoudnia, Mags Global Capital LLC, twenty unnamed defendants v. Citibank, N.A. (National Association)

TOPICS

personal jurisdiction · motions to dismiss · civil procedure · commercial litigation · uniform commercial code

PRACTICE AREAS

civil procedure · commercial litigation · banking

QUESTIONS PRESENTED

1. Whether the court had general personal jurisdiction over Citibank in California.
2. Whether the court had specific personal jurisdiction over Citibank based on the alleged wire-transfer and fraud-monitoring activities.
3. Whether plaintiffs were entitled to jurisdictional discovery to establish specific personal jurisdiction.
4. Whether the court needed to decide Citibank's Rule 12(b)(6) challenge after finding personal jurisdiction lacking.

HOLDINGS

1. The court lacked general personal jurisdiction over Citibank in California because Citibank's designated main office was in South Dakota, and plaintiffs did not establish that Citibank was at home in California.
2. Plaintiffs failed to establish specific personal jurisdiction over Citibank because they alleged no facts connecting their claims to Citibank's California activities.
3. The court denied plaintiffs' request for jurisdictional discovery.
4. The court did not reach Citibank's argument that the complaint failed to state a claim under Rule 12(b)(6).

KEY QUOTATIONS

> *"Therefore, Citibank is at "home" for general jurisdiction purposes in South Dakota and not in California."* (at 3)

> *"Plaintiffs have not met their burden to establish specific or general personal jurisdiction."* (at 4)

FACTUAL BACKGROUND

Plaintiffs alleged that a family trust agreed to purchase California real property for $46,345,284.50 and selected Granite Escrow to assist with the transaction. An unknown fraudster impersonating Granite Escrow representatives instructed plaintiffs to make three wire transfers to a Citibank account held by Transpo Express, although the transfer forms identified Granite Escrow as the intended beneficiary. Plaintiffs alleged that Citibank detected mismatches between the beneficiary and account-holder information but failed to stop the transfers, causing plaintiffs' monetary loss.

PROCEDURAL HISTORY

Plaintiffs filed the action in the Northern District of California on August 1, 2025. Citibank moved to dismiss for lack of personal jurisdiction and failure to state a claim. The court denied jurisdictional discovery, granted the motion based on lack of personal jurisdiction, and directed the Clerk to close the case and terminate pending deadlines.

DISPOSITION

dismissed

CASES CITED

- Helicopteros Nacionales de Colombia, S.A. v. Hall, 466 U.S. 408, 414-16 (1984)
- Mavrix Photo, Inc. v. Brand Techs., Inc., 647 F.3d 1218, 1223 (9th Cir. 2011)
- Boschetto v. Hansing, 539 F.3d 1011, 1015 (9th Cir. 2008)
- Rouse v. Wachovia Mortg., FSB, 747 F.3d 707, 708 (9th Cir. 2014)
- Haring v. Wells Fargo Bank N.A., No. C 18-3310 SBA, 2018 WL 10471109, at *4 (N.D. Cal. Oct. 17, 2018)
- Daimler AG v. Bauman, 571 U.S. 117, 138 (2014)
- Zidell v. E. W. Bank, No. 3:24-CV-2340-D, 2025 WL 919385, at *3 (N.D. Tex. Mar. 26, 2025)
- Schwarzenegger v. Fred Martin Motor Co., 374 F.3d 797, 802 (9th Cir. 2004)
- Terracom v. Valley Nat'l Bank, 49 F.3d 555, 561 (9th Cir. 1995)
- Wells Fargo & Co. v. Wells Fargo Express Co., 556 F.2d 406, 430 (9th Cir. 1977)