

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
CALIFORNIA

Seelig v. Central Intelligence Agency

Seelig · No. 25-cv-06592-JST · Decided August 21, 2025

SUMMARY

The United States District Court for the Northern District of California adopted a magistrate judge’s recommendation to dismiss Christopher Seelig’s claims against the Central Intelligence Agency and other defendants without leave to amend. The court held that the claims were frivolous and denied as moot Seelig’s motion for an expedited hearing.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of California                                                                                                                                                                                                                        |
| WRITING FOR THE COURT | Jon S. Tigar                                                                                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court, Northern District of California                                                                                                                                                                                                                               |
| DECIDED               | August 21, 2025                                                                                                                                                                                                                                                                             |
| DOCKET                | 25-cv-06592-JST                                                                                                                                                                                                                                                                             |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | The district court reviewed a magistrate judge's report and recommendation recommending dismissal without leave to amend, considered the plaintiff's timely objections, adopted the recommendation, dismissed the case, and denied the plaintiff's motion for an expedited hearing as moot. |
| STANDARD OF REVIEW    | The district court reviewed the magistrate judge's report and recommendation and the plaintiff's timely objections.                                                                                                                                                                         |
| PRECEDENTIAL VALUE    | Unknown; district court opinion with no reporter citation and no stated precedential status                                                                                                                                                                                                 |

TOPICS

- subject matter jurisdiction
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

- civil procedure
- federal jurisdiction
- remedies

## QUESTIONS PRESENTED

1. Whether the complaint should be dismissed as frivolous and too insubstantial to support federal subject matter jurisdiction.
2. Whether the court needed to decide whether the claims arose under statutes that provide a basis for civil liability.
3. Whether the plaintiff's motion for an expedited hearing remained live after dismissal of the complaint.

## HOLDINGS

1. Claims that are frivolous, attenuated, and unsubstantial may be dismissed because they are too insubstantial to invoke federal subject matter jurisdiction. Seelig's claims were frivolous and therefore subject to dismissal.
2. The court did not need to decide whether the plaintiff's claims arose under statutes that provide a basis for civil liability because the claims were independently subject to dismissal as frivolous.
3. The motion for an expedited hearing was denied as moot because the complaint was dismissed.

## KEY QUOTATIONS

*“[F]ederal courts are without power to entertain claims otherwise within their jurisdiction if they are so attenuated and unsubstantial as to be absolutely devoid of merit, wholly” (at 1)*

## FACTUAL BACKGROUND

Christopher Seelig brought claims against the Central Intelligence Agency and other defendants under federal criminal statutes. The district court determined that the claims were frivolous and too insubstantial to support federal jurisdiction. The court dismissed the complaint without leave to amend and denied Seelig's motion for an expedited hearing as moot.

## PROCEDURAL HISTORY

Magistrate Judge Thomas Hixson recommended dismissal without leave to amend on two independent grounds: the claims were based on federal criminal statutes that do not provide a private basis for civil liability, and the claims were frivolous. Plaintiff Christopher Seelig filed objections and moved for an expedited hearing. The district court adopted the recommendation, relying on frivolousness and the substantiality doctrine without deciding whether the claims could arise under statutes creating civil liability.

## DISPOSITION

dismissed

## CASES CITED

- Hagans v. Lavine, 415 U.S. 528, 536–37 (1974)
- Ou-Young v. Rudy, No. 21-CV-07361-BLF, 2022 WL 2343043, at \*3 (N.D. Cal. June 29, 2022)

- Feng v. Tripp, No. 24-cv-07539-JST, 2025 WL 1616638, at \*2 (N.D. Cal. June 6, 2025)

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