

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Andrejev v. Chatigny

Andrejev · No. 2:24-cv-2651-TLN-JDP (PS) · Decided December 19, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Eugene E. Andrejev’s civil rights complaint concerning an alleged unlawful blood draw, false arrest and detention, and interference with familial association. The court ordered plaintiff to provide identifying information for at least one Doe defendant within sixty days and recommended dismissal without leave to amend of the official-capacity claims against Sheriff Wayne Woo and County Executive Officer Daniel Chatigny.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 19, 2025
DOCKET	2:24-cv-2651-TLN-JDP (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se in forma pauperis civil-rights complaint under 28 U.S.C. § 1915(e), with findings and recommendations to the assigned district judge.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e), the court screens an in forma pauperis complaint and dismisses claims that are frivolous or malicious, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant. The complaint must satisfy Federal Rule of Civil Procedure 8(a)(2) and plausibility requirements under Bell Atlantic Corp. v. Twombly and Ashcroft v. Iqbal; pro se pleadings are construed liberally.
PRECEDENTIAL VALUE	Nonprecedential findings and recommendations of a federal magistrate judge; subject to review by the assigned district judge.

PARTIES

Eugene E. Andreyev v. Daniel Chatigny, Wayne Woo, Doe deputy defendants

TOPICS

section 1983 civil rights pleadings motions to dismiss civil procedure

PRACTICE AREAS

civil procedure civil rights constitutional law federal courts

QUESTIONS PRESENTED

1. Whether the official-capacity claims against Woo and Chatigny adequately pleaded a municipal policy or custom under 42 U.S.C. § 1983.
2. Whether the warrantless blood-draw claim could proceed against unidentified Doe defendants without identifying at least one defendant for service.
3. What screening and pleading standards apply to the pro se in forma pauperis complaint.

HOLDINGS

1. The claims against Woo and Chatigny, sued only in their official capacities, failed to state a viable § 1983 claim because plaintiff did not allege facts identifying a Placer County policy or custom that caused the asserted constitutional injuries.
2. The warrantless blood-draw claim could potentially be actionable under the Fourth Amendment, but it could not proceed at that stage without identification of at least one Doe defendant for service.
3. An in forma pauperis complaint must be screened for frivolousness, maliciousness, failure to state a claim, and claims seeking relief from immune defendants; it must also contain a short and plain statement and plausible factual allegations.

KEY QUOTATIONS

“The claims against Woo and Chatigny be DISMISSED without leave to amend for failure to state a viable claim.” (1)

“Plaintiff shall have sixty days to provide identifying information for at least one defendant.” (1)

FACTUAL BACKGROUND

Plaintiff alleged that Placer County sheriff's deputies unlawfully drew his blood, falsely arrested and detained him, and deprived him of familial association after his daughter died while he was detained. He sued Sheriff Wayne Woo and County Executive Officer Daniel Chatigny only in their official capacities and also named unidentified Doe deputies. Plaintiff alleged generally that the county maintained customs of arresting people without probable cause, conducting nonconsensual blood draws, and detaining individuals without justification.

PROCEDURAL HISTORY

Plaintiff filed an amended complaint alleging false arrest and detention, an unlawful blood draw, and deprivation of familial association. Sheriff Wayne Woo and County Executive Officer Daniel Chatigny were named only in their official capacities, while the allegedly involved deputies remained unidentified Doe defendants. The magistrate judge recommended dismissal without leave to amend of the claims against Woo and Chatigny and ordered plaintiff to provide identifying information for at least one Doe defendant within sixty days so that service could be effected.

DISPOSITION

other

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Kobold v. Good Samaritan Regional Medical Center, 832 F.3d 1024, 1038 (9th Cir. 2016)
- Nagrampa v. MailCoups, Inc., 469 F.3d 1257, 1264 n.2 (9th Cir. 2006) (en banc)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Hayes v. Idaho Correctional Center, 849 F.3d 1204, 1208 (9th Cir. 2017)
- Bruns v. National Credit Union Administration, 122 F.3d 1251, 1257 (9th Cir. 1997)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Kentucky v. Graham, 473 U.S. 159, 166 (1985)
- Monell v. Department of Social Services, 436 U.S. 658, 694 (1978)
- Dougherty v. City of Covina, 654 F.3d 892, 900 (9th Cir. 2011)
- Birchfield v. North Dakota, 579 U.S. 438, 474 (2016)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Yist, 951 F.2d 1153 (9th Cir. 1991)