

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

John Anaya v. County of Napa, et al.

Anaya · No. Civil Action No. 3:25CV255 (RCY) · Decided March 16, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia dismissed John Anaya’s civil rights and RICO action arising from California family-court, child-welfare, and related criminal proceedings. The court held that the judicial defendants were protected by absolute judicial immunity and that venue was improper in Virginia under both the RICO venue statute and the general federal venue statute. The court denied leave to amend as futile and dismissed the claims against a nonappearing defendant as unsupported.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Roderick C. Young
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	March 16, 2026
DOCKET	Civil Action No. 3:25CV255 (RCY)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a pro se civil-rights and RICO action arising from California family-court, child-welfare, and related criminal proceedings. The County Defendants, Judicial Defendants, and Carl Winter moved to dismiss under Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6). Plaintiff also moved for leave to file several amended complaints and limited in camera discovery.
STANDARD OF REVIEW	On a Rule 12(b)(1) motion, the plaintiff bears the burden of establishing that subject-matter jurisdiction is proper. On a Rule 12(b)(3) motion, a plaintiff need make only a prima facie showing of proper venue; the court may consider evidence outside the pleadings and otherwise views the facts in the light most favorable to the plaintiff. Leave to amend may be denied for futility when the proposed complaint would fail to withstand Rule 12(b)(6) scrutiny.

PRECEDENTIAL VALUE	Unknown
PARTIES	John Anaya v. County of Napa, Christine Briseno, Jessica Marie Lopez Anaya, Alfredo Larranaga, Allison Haley, Sheryl Bratton, Alexys Vosmeier, Veronica Piper Jefferson, Jennifer Yasumoto, Lauren Noga, Kendall Baron, Joseph Solga, Robert Stamps, Mark Boessenecker, Elia Ortiz, Carl Winter, Robert Fleshman

TOPICS

venue

motions to dismiss

motion to amend

civil procedure

civil rights

PRACTICE AREAS

civil rights

civil procedure

RICO

federal courts

QUESTIONS PRESENTED

1. Whether the California judicial defendants were protected by absolute judicial immunity.
2. Whether venue was proper in the Eastern District of Virginia for Plaintiff's RICO and non-RICO claims.
3. Whether the action should be dismissed rather than transferred under 28 U.S.C. § 1406(a).
4. Whether Plaintiff should receive leave to amend when the proposed amendments would not cure the deficiencies.
5. Whether the claims against Robert Fleshman, who was served but did not appear, could be dismissed as frivolous and unsupported.

HOLDINGS

1. The Judicial Defendants were absolutely immune from Plaintiff's damages claims because the challenged conduct consisted of judicial actions taken in proceedings over which they had subject-matter jurisdiction, and Plaintiff did not plausibly allege either a nonjudicial act or an act taken in the complete absence of jurisdiction.
2. Venue was improper in the Eastern District of Virginia under 18 U.S.C. § 1965(a) because Plaintiff did not allege that any defendant resided, was found, maintained an agent, or regularly transacted substantial and continuous business in Virginia.
3. Venue was also improper under 28 U.S.C. § 1391(b) because no defendant was alleged to reside in Virginia, no substantial part of the events occurred in Virginia, and the complaint indicated that the action could have been brought in California.
4. Dismissal, rather than transfer under 28 U.S.C. § 1406(a), was appropriate because Plaintiff did not request transfer and the court had strong reservations about the merits of the claims.
5. Leave to amend was denied as futile because the proposed amendments would not alter the judicial-immunity or venue analyses and would not cure the deficiencies in the action.

6. The court could dismiss the claims against Robert Fleshman sua sponte as frivolous and unsupported because the complaint contained no factual allegations connecting him to any claim or establishing a basis for jurisdiction.

KEY QUOTATIONS

“It is well-settled that judges are immune from liability for damages arising out of their judicial actions.”
(Section IV.A)

“To hold that a claim arises anywhere its economic effect is felt would mean that the situs of a cause of action would always be the residence of the plaintiff, and would render meaningless the distinction which § 1391 makes between the place where the claim arises and the place where the plaintiff resides.” (Section IV.B.2)

FACTUAL BACKGROUND

The claims arose almost entirely from alleged misconduct during California family-court, child-welfare, and related criminal proceedings in Napa County. Plaintiff alleged that County personnel failed to protect him and his son from dangers associated with his wife's alleged criminal connections, and that California judges and opposing counsel conspired against him through biased hearings, adverse rulings, and use of allegedly disproven evidence. The complaint contained no allegations concerning persons or events in Virginia; Plaintiff asserted only in response to the motions that continuing harmful effects occurred in Virginia after his relocation.

PROCEDURAL HISTORY

Plaintiff filed the complaint on April 2, 2025. The County Defendants and Judicial Defendants moved to dismiss in June 2025, and Carl Winter later moved to dismiss and to join the County Defendants' motion. Plaintiff filed multiple motions for leave to amend and a motion for limited in camera discovery. The court granted the motions to dismiss, denied leave to amend as futile, dismissed the claims against the defaulted defendant Robert Fleshman as frivolous and unsupported, and dismissed the action in its entirety; remaining motions were denied as moot.

DISPOSITION

dismissed

CASES CITED

- Malbon v. Penn. Millers Mut. Ins. Co., 636 F.2d 936, 939 n.8 (4th Cir. 1980)
- Marinaro v. Moore, 2024 WL 5430834, at *8 n.4 (E.D. Va. Sept. 10, 2024)
- Richmond, Fredericksburg & Potomac R.R. v. United States, 945 F.2d 765, 768 (4th Cir. 1991)
- Aggarao v. MOL Ship Mgmt. Co., Ltd., 675 F.3d 355, 365–66 (4th Cir. 2012)
- Mitrano v. Hawes, 377 F.3d 402, 405 (4th Cir. 2004)
- Global Seafood Inc. v. Bantry Bay Mussels Ltd., 659 F.3d 221, 224 (2d Cir. 2011)
- Chu v. Griffith, 771 F.2d 79, 81 (4th Cir. 1985)
- Bradley v. Fisher, 80 U.S. 335 (1872)

- *Cleavinger v. Saxner*, 474 U.S. 193, 199–200 (1985)
- *Mireles v. Waco*, 502 U.S. 9, 11–12 (1991)
- *Stump v. Sparkman*, 435 U.S. 349, 355–56, 359 (1978)
- *Jackson v. Houck*, 181 F. App'x 372, 373 (4th Cir. 2006)
- *Timmerman v. Brown*, 528 F.2d 811, 814 (4th Cir. 1975)
- *ESAB Grp., Inc. v. Centricut, Inc.*, 126 F.3d 617, 626–27 (4th Cir. 1997)
- *Galloway v. Big Picture Loans, LLC*, 2023 U.S. Dist. LEXIS 223612, at **22–23 (E.D. Va. Dec. 13, 2023)
- *Magic Toyota, Inc. v. Southeast Toyota Distributors, Inc.*, 784 F. Supp. 306, 319 (D.S.C. 1992)
- *Sweigert v. Goodman*, 2018 U.S. Dist. LEXIS 159237, at *6 (D.S.C. Aug. 29, 2018)
- *First Financial Leasing Corp. v. Hartge*, 671 F. Supp. 538, 543 (N.D. Ill. 1987)
- *Berg v. Kingdom of the Neth.*, 24 F.4th 987, 999 (4th Cir. 2022)
- *In re Triangle Capital Corp. Sec. Litig.*, 988 F.3d 743, 750 (4th Cir. 2021)
- *Johnson v. Oroweat Foods Co.*, 785 F.2d 503, 510 (4th Cir. 1986)
- *Katyle v. Penn Nat. Gaming, Inc.*, 637 F.3d 462, 471 (4th Cir. 2011)
- *Mallard v. U.S. Dist. Court*, 490 U.S. 296, 307–08 (1989)
- *Ross v. Baron*, 493 F. App'x 405, 406 (4th Cir. 2012)
- *Fitzgerald v. First E. Seventh Street Tenants Corp.*, 221 F.3d 362, 364 (2d Cir. 2000)
- *Ricketts v. Midwest Nat'l Bank*, 874 F.2d 1177, 1181 (7th Cir. 1989)
- *Franklin v. State of Or., State Welfare Div.*, 662 F.2d 1337, 1342 (9th Cir. 1981)
- *Weller v. Dep't of Soc. Servs.*, 901 F.2d 387, 391 (4th Cir. 1990)
- *Potter v. Clark*, 497 F.2d 1206, 1207 (7th Cir. 1974)
- *Brzozowski v. Randall*, 281 F. Supp. 306, 312 (E.D. Pa. 1968)
- *Beaudett v. City of Hampton*, 775 F.2d 1274, 1278 (4th Cir. 1985)
- *Bing v. Brivo Sys., LLC*, 959 F.3d 605, 618 (4th Cir. 2020)
- *Britt v. Dejoy*, 45 F.4th 790, 795–96 (4th Cir. 2022)