

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Christopher Lee Card v. County of Alameda, et al.

Card v. County of Alameda · No. 24-cv-04760-AMO (PR) · Decided April 18, 2025

SUMMARY

The United States District Court for the Northern District of California dismissed Christopher Lee Card’s 42 U.S.C. § 1983 complaint seeking monetary and punitive damages against Alameda County and various prosecutors, public defenders, psychologists, and county counsel. The court held that the individual defendants were protected by absolute immunity or were not state actors, and that Card had not adequately alleged municipal liability against Alameda County. The dismissal was without leave to amend, and the court certified that an in forma pauperis appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Araceli Martinez-Olguin
JURISDICTION	United States District Court for the Northern District of California
DECIDED	April 18, 2025
DOCKET	24-cv-04760-AMO (PR)
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented prisoner brought an action under 42 U.S.C. § 1983 seeking punitive and monetary damages, and injunctive relief, against Alameda County and individual county officials. The district court conducted mandatory prisoner screening under 28 U.S.C. § 1915A and dismissed the complaint without leave to amend.
STANDARD OF REVIEW	Mandatory preliminary screening under 28 U.S.C. § 1915A; the court must identify cognizable claims and dismiss claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. The court also liberally construes pleadings filed by self-represented plaintiffs.
PRECEDENTIAL VALUE	nonprecedential district court order
PARTIES	Christopher Lee Card v. County of Alameda, Kevin Ikuma, Amy Watt, Marlin Griffith, Brendon Woods, Youseef Elias, Joshi Valentine, Sue

TOPICS

section 1983

prisoners rights

civil rights

government liability

civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional torts

federal civil procedure

criminal procedure

QUESTIONS PRESENTED

1. Whether the claims against the deputy district attorney were barred by absolute prosecutorial immunity.
2. Whether the claims against the public defenders stated a claim under 42 U.S.C. § 1983 when the public defenders were performing traditional functions of defense counsel.
3. Whether the claims against the court-appointed psychologists were barred by absolute witness immunity.
4. Whether the claims against the deputy county counsel were barred by absolute immunity for prosecutorial or quasi-judicial functions.
5. Whether the complaint stated a claim for municipal liability against Alameda County under § 1983.
6. Whether the court should dismiss the claims without leave to amend and certify that an in forma pauperis appeal would not be taken in good faith.

HOLDINGS

1. A prosecutor is absolutely immune from damages liability for conduct undertaken in the advocate's role in initiating and pursuing a criminal case; therefore, Card's claims against Deputy District Attorney Ikuma were dismissed.
2. A public defender does not act under color of state law when performing a lawyer's traditional functions, including representation related to a client's mental competency; therefore, Card's § 1983 claims against the public defenders were dismissed.
3. Witnesses are absolutely immune from liability for testimony in state or federal court proceedings, including allegedly perjured testimony; therefore, Card's claims against the court-appointed psychologists were dismissed.
4. Absolute immunity extends to government officials performing prosecutorial or judicial functions, including analogous functions in administrative or adversarial proceedings; to the extent the deputy county counsels acted in a prosecutorial role, they were absolutely immune, and the claims against them were dismissed.
5. A local government cannot be held liable under § 1983 solely on a respondeat superior theory; because Card alleged no other basis for municipal liability, his claim against Alameda County was dismissed.
6. All claims for punitive and monetary damages were dismissed without leave to amend, and the court certified under 28 U.S.C. § 1915(a)(3) that an in forma pauperis appeal would not be taken in good faith.

KEY QUOTATIONS

“A public defender does not act under color of state law, an essential element of a claim under section 1983, when performing a lawyer’s traditional functions, such as entering pleas, making motions, objecting at trial, cross-examining witnesses, and making closing arguments, or even in the initial representation to determine a client’s mental competency, as alleged by Card.” (at 2)

“Finally, Card has not alleged grounds for municipal liability against Alameda County based on any theory other than that of respondeat superior. This is not a sufficient ground for municipal liability.” (at 3)

FACTUAL BACKGROUND

Card was incarcerated at Santa Rita Jail and filed a handwritten civil-rights complaint concerning state criminal competency proceedings, evaluations by psychologists, and alleged conduct by a judge, prosecutor, public defenders, county counsel, and psychologists. He alleged due-process violations, conspiracy, misconduct, perjury, falsification, and related claims, and sought damages and injunctive relief. The complaint also named Alameda County, but alleged municipal liability primarily through respondeat superior.

PROCEDURAL HISTORY

Card filed the action on January 25, 2024 and was granted leave to proceed in forma pauperis. The court screened the complaint under 28 U.S.C. § 1915A, concluded that the claims were barred by absolute immunity, lack of state action, or failure to plead a municipal-liability basis, and dismissed all claims for punitive and monetary damages without leave to amend. The court also certified that an in forma pauperis appeal would not be taken in good faith and directed the clerk to close the file.

DISPOSITION

dismissed

CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1988)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994)
- *Younger v. Harris*, 401 U.S. 37, 43-54 (1971)
- *Buckley v. Fitzsimmons*, 509 U.S. 259, 272-73 (1993)
- *Imbler v. Pachtman*, 424 U.S. 409, 431 (1976)
- *Polk County v. Dodson*, 454 U.S. 312, 318-19 (1981)
- *Briscoe v. LaHue*, 460 U.S. 325, 329-46 (1983)
- *Holt v. Castaneda*, 832 F.2d 123, 127 (9th Cir. 1987)
- *Burns v. County of King*, 883 F.2d 819 (9th Cir. 1989)
- *Butz v. Economou*, 438 U.S. 478, 513-15 (1978)
- *Monell v. Department of Social Services*, 436 U.S. 658, 691 (1978)

- Lacey v. Maricopa County, 693 F.3d 896, 928 (9th Cir. 2012) (en banc)
- Coppedge v. United States, 369 U.S. 438, 445 (1962)
- Gardner v. Pogue, 558 F.2d 548, 550 (9th Cir. 1977)

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