

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Nathanael Smith v. Newsome et al.

Case No. 1:24-cv-00592-KES-BAM (E.D. Cal. Jan. 14, 2026) · No. 1:24-cv-00592-KES-BAM · Decided
January 15, 2026

SUMMARY

The document contains Findings and Recommendations from the U.S. District Court for the Eastern District of California recommending dismissal of Nathanael Smith’s Second Amended Complaint against Newsome and other defendants. The court concludes that the complaint violates Federal Rule of Civil Procedure 8, fails to state cognizable constitutional or statutory claims, and seeks impermissible federal review of state-court custody, visitation, child-support, and restraining-order decisions. The court also concludes that further amendment would be futile and recommends dismissal with prejudice without further leave to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 15, 2026
DOCKET	1:24-cv-00592-KES-BAM
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on screening Plaintiff's Second Amended Complaint under 28 U.S.C. § 1915(e)(2), recommending dismissal with prejudice and denial of further leave to amend.
STANDARD OF REVIEW	The complaint was screened under 28 U.S.C. § 1915(e)(2). The court applied the Rule 8 and plausibility standards, accepting factual allegations as true but not accepting legal conclusions or unwarranted inferences.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Nathanael Smith v. Newsome et al.

TOPICS

civil procedure

motions to dismiss

subject matter jurisdiction

child custody

child support

PRACTICE AREAS

civil procedure

civil rights

constitutional law

family law

QUESTIONS PRESENTED

1. Whether the Second Amended Complaint complied with Federal Rule of Civil Procedure 8 and stated a plausible claim for relief.
2. Whether the district court had subject-matter jurisdiction to review or alter state-court custody, visitation, child-support, and restraining-order judgments under the Rooker-Feldman doctrine.
3. Whether Plaintiff stated cognizable claims under the First, Second, Fifth, Sixth, Seventh, Eighth, or Fourteenth Amendments and the cited federal statutes.
4. Whether judicial and court-personnel immunity barred claims against the state-court judges and personnel.
5. Whether further leave to amend should be denied as futile.

HOLDINGS

1. The Second Amended Complaint failed to comply with Federal Rule of Civil Procedure 8 and failed to state a plausible claim because it relied on broad, conclusory allegations and legal argument without sufficient factual allegations connecting specific defendants to actionable misconduct.
2. The district court lacked subject-matter jurisdiction to review, reverse, or modify the state-court custody, visitation, child-support, and restraining-order judgments challenged by Plaintiff.
3. Plaintiff failed to state cognizable claims under the asserted constitutional amendments or cited federal statutes.
4. The defendant judges and court personnel were immune from Plaintiff's claims based on acts performed in their judicial roles within the jurisdiction of their courts.
5. Further leave to amend should be denied because amendment would be futile.

KEY QUOTATIONS

“Rooker-Feldman doctrine applies to “cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments.”” (at 20-21)

“Plaintiff cannot state claims against the defendant judges or court personnel because judges have absolute immunity for judicial acts taken within the jurisdiction of their courts.” (at 28)

FACTUAL BACKGROUND

Plaintiff challenged California state-court custody, visitation, child-support, and domestic-violence-restraining-order proceedings involving his son. He alleged constitutional violations, statutory violations, judicial overreach,

litigation abuse, bias, and procedural irregularities by state judges, commissioners, court personnel, agencies, and other individuals. He sought damages, reversal of state-court orders, restoration of custody, release from county jail, and other injunctive and criminal remedies.

PROCEDURAL HISTORY

Plaintiff, proceeding pro se and in forma pauperis, filed a Second Amended Complaint after the court screened his First Amended Complaint and granted leave to amend. The court found that the Second Amended Complaint still failed to comply with Federal Rule of Civil Procedure 8, failed to state a cognizable claim, and sought review of state-court custody and related orders over which the district court lacked jurisdiction. The magistrate judge recommended dismissal with prejudice and denial of further leave to amend as futile, subject to objections and review by the assigned district judge.

DISPOSITION

other

CASES CITED

- Hartmann v. CDCR, 707 F.3d 1114, 1130 (9th Cir. 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Doe I v. Wal-Mart Stores, Inc., 572 F.3d 677, 681 (9th Cir. 2009)
- Moss v. U.S. Secret Service, 572 F.3d 962, 969 (9th Cir. 2009)
- Lam v. California Department of Corrections & Rehabilitation, No. 1:23-CV-01167-BAM-PC, 2023 WL 8701254, at *2 (E.D. Cal. Dec. 15, 2023)
- Ankenbrandt v. Richards, 504 U.S. 689, 702-704 (1992)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)
- Lance v. Dennis, 546 U.S. 459, 463 (2006)
- Worldwide Church of God v. McNair, 805 F.2d 888, 890 (9th Cir. 1986)
- Reusser v. Wachovia Bank, N.A., 525 F.3d 855, 858-59 (9th Cir. 2008)
- Henrichs v. Valley View Development, 474 F.3d 609, 613 (9th Cir. 2007)
- Rooker v. Fidelity Trust Co., 263 U.S. 413, 415 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462, 483 (1983)
- Sosna v. Iowa, 419 U.S. 393, 404 (1975)
- In re Interest of Cooper, 5 Kan. App. 2d 584, 621 P.2d 437 (1980), rev'd, 230 Kan. 57, 631 P.2d 632 (1981)
- Yick Wo v. Hopkins, 118 U.S. 356 (1886)
- Hardwick v. County of Orange, 844 F.3d 1112, 1115 (9th Cir. 2017)
- In re Interest of C.H., 343 Ga. App. 1, 805 S.E.2d 637 (2017)
- Le v. Scott, No. G038868, 2008 WL 616254, at *3 (Cal. Ct. App. Mar. 7, 2008)

- Spears v. El Dorado County Courts, No. 2:16-CV-2655-DMC-P, 2019 WL 3202802, at *3 (E.D. Cal. July 16, 2019)
- Monell v. Department of Social Services, 436 U.S. 658 (1978)
- Bruns v. National Credit Union Administration, 122 F.3d 1251, 1257 (9th Cir. 1997)
- Schucker v. Rockwood, 846 F.2d 1202, 1204 (9th Cir. 1988)
- Mireles v. Waco, 502 U.S. 9, 11 (1991)
- Meek v. County of Riverside, 183 F.3d 962, 965 (9th Cir. 1999)
- Mullis v. U.S. Bankruptcy Court, 828 F.2d 1385, 1390 (9th Cir. 1987)
- Bell v. Wolfish, 441 U.S. 520, 535 n.16 (1979)
- Ingraham v. Wright, 430 U.S. 651, 671 n.40 (1977)
- Spears v. Weiner, No. 2:14-CV-0950-CMK-P, 2015 WL 1440319, at *5 (E.D. Cal. Mar. 27, 2015)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)