

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Dustin Lamont Crawford v. Fresno County Jail, et al.

Crawford · No. 1:25-cv-0869 JLT SAB · Decided September 12, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted in full the magistrate judge’s findings and recommendations concerning Dustin Lamont Crawford’s civil rights complaint arising from his custody at Fresno County Jail. The court dismissed the second amended complaint without leave to amend and without prejudice for failure to state a cognizable civil-rights claim and for lack of subject-matter jurisdiction, and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 12, 2025
DOCKET	1:25-cv-0869 JLT SAB
DISPOSITION	dismissed
PROCEDURAL POSTURE	After screening Plaintiff’s second amended civil-rights complaint under 28 U.S.C. § 1915A(a), a magistrate judge recommended dismissal without leave to amend and without prejudice. The district court conducted de novo review under 28 U.S.C. § 636(b)(1), adopted the findings and recommendations, dismissed the action, and directed the clerk to close the case.
STANDARD OF REVIEW	De novo review of the magistrate judge’s findings and recommendations under 28 U.S.C. § 636(b)(1).
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Dustin Lamont Crawford v. Fresno County Jail, et al.

TOPICS

- subject matter jurisdiction
- pleadings
- section 1983
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's findings and recommendations after conducting de novo review under 28 U.S.C. § 636(b)(1).
2. Whether the second amended complaint should be dismissed because it failed to articulate a civil-rights violation or establish subject matter jurisdiction.
3. Whether dismissal should be without leave to amend and without prejudice.

HOLDINGS

1. The district court adopted the magistrate judge's findings and recommendations in full after conducting de novo review.
2. The action had to be dismissed without prejudice because the court was unable to find that it had subject matter jurisdiction over the matter.
3. The second amended complaint was dismissed without leave to amend.

KEY QUOTATIONS

“Because the Court is unable to find it has jurisdiction over this matter, dismissal without prejudice is appropriate.” (at 2)

“Given the SAC fails to articulate even a short and plain statement of the claim against the unspecified number of Doe ‘CO/Sheriffs’ Defendants, the Court cannot independently discern any violation of a civil right from the face of the SAC.” (at 1)

FACTUAL BACKGROUND

Dustin Lamont Crawford alleged that his civil rights were violated while he was in custody at Fresno County Jail. His second amended complaint did not state what civil right had been violated and did not provide a short and plain statement of a claim against the unspecified Doe correctional-officer or sheriff defendants. The court noted that Plaintiff had already received two opportunities to cure deficiencies but had not supplied sufficient factual detail to state a plausible claim or establish subject matter jurisdiction.

PROCEDURAL HISTORY

Plaintiff filed a civil-rights complaint concerning alleged violations while he was in custody at Fresno County Jail and later filed a second amended complaint. The magistrate judge found that the second amended complaint failed to identify the civil right allegedly violated, failed to provide a short and plain statement against the unspecified Doe defendants, and did not establish a basis for subject matter jurisdiction. Plaintiff did not object to the findings and recommendations within the prescribed period. The district court reviewed the matter de novo, adopted the recommendations in full, dismissed without leave to amend and without prejudice, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Kelly v. Fleetwood Enterprises, Inc., 377 F.3d 1034, 1036 (9th Cir. 2004)
- Missouri ex rel. Koster v. Harris, 847 F.3d 646, 656 (9th Cir. 2017)

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