

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Vance Scott Senior v. Woodruff Camus, et al.

Vance Scott Senior v. Woodruff Camus, Civil Action No. 25-2375, Section "G" (2) (E.D. La. Feb. 3, 2026) · No.
Civil Action No. 25-2375; 2:25-cv-02375 · Decided February 3, 2026

SUMMARY

This show cause order and reasons from the U.S. District Court for the Eastern District of Louisiana grants Vance Scott Senior leave to proceed in forma pauperis and conducts the required screening under 28 U.S.C. § 1915(e). The court analyzes the complaint’s claims based on federal and state criminal statutes, civil RICO, 42 U.S.C. § 1983, and constitutional provisions, including issues concerning improper defendants and the asserted seizure of property. The excerpt indicates that several claims and defendants are legally frivolous or fail to state a claim.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	February 3, 2026
DOCKET	Civil Action No. 25-2375; 2:25-cv-02375
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a pro se civil-rights complaint and an application to proceed in forma pauperis. The court granted in forma pauperis status, withheld issuance of summons pending statutory screening, and ordered plaintiff to show cause why the complaint should not be dismissed under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must screen an in forma pauperis complaint and dismiss it if it is frivolous or malicious, fails to state a claim on which relief may be granted, or seeks monetary relief from an immune defendant. A claim is frivolous when it lacks an arguable basis in law or fact. In evaluating failure to state a claim, the court assumes factual allegations are true but requires allegations that rise above a speculative level.
PRECEDENTIAL VALUE	nonprecedential district court order
PARTIES	Vance Scott Senior v. Woodruff Camus, et al.

TOPICS

civil procedure section 1983 procedural due process civil rights remedies

PRACTICE AREAS

civil procedure civil rights constitutional law remedies probate

QUESTIONS PRESENTED

1. Whether plaintiff demonstrated financial eligibility to proceed in forma pauperis.
2. Whether the complaint was subject to summary dismissal under 28 U.S.C. § 1915(e)(2) because it relied on criminal statutes that do not create private causes of action.
3. Whether the civil RICO claims were legally or factually frivolous or failed to state a claim.
4. Whether the St. Charles Parish Sheriff's Office, the Estate of Pierre Scott, the parish planning and zoning department, and officials sued in their official capacities were proper defendants.
5. Whether the complaint plausibly stated claims under 42 U.S.C. § 1983 based on the Louisiana Constitution, the Fifth Amendment Due Process Clause, the Fourteenth Amendment Equal Protection Clause, the Fourth Amendment, or Fourteenth Amendment procedural due process.

HOLDINGS

1. A plaintiff who demonstrates that payment of the filing fee would cause undue financial hardship may proceed in forma pauperis, subject to the statutory screening requirements of § 1915(e)(2).
2. The court must screen an in forma pauperis complaint under 28 U.S.C. § 1915(e)(2) and may dismiss claims that are frivolous, malicious, fail to state a claim, or seek relief from an immune defendant.
3. Private plaintiffs may not bring civil claims solely under federal or Louisiana criminal statutes that do not expressly create a private cause of action.
4. A civil RICO claim requires a person, a pattern of racketeering activity, and a connection to an enterprise; conclusory allegations that lump defendants together do not satisfy that requirement.
5. A § 1983 claim requires the deprivation of a federal constitutional or statutory right under color of state law by a state actor; violations of state law or the Louisiana Constitution cannot be bootstrapped into § 1983 liability.
6. A procedural due process claim concerning vehicle towing is not complete until the plaintiff alleges both a deprivation of a protected property interest and inadequate state process; where state law requires a request for an administrative hearing, failure to allege that the plaintiff requested a hearing defeats the claim as pleaded.

KEY QUOTATIONS

“A claim is “frivolous where it lacks an arguable basis either in law or in fact.”” (Section II)

“Criminal charges, however, cannot be brought by private individuals” (Section III.A)

“Because § 1983 merely provides a remedy for designated rights, rather than creating any substantive rights, “an underlying constitutional or statutory violation is a predicate to liability.”” (Section III.D)

“The “fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.”” (Section III.D.4)

FACTUAL BACKGROUND

Plaintiff alleged that defendants conspired against him in connection with a July 22, 2025 hearing and an October 9, 2025 seizure of property by officers of the St. Charles Parish Sheriff's Office pursuant to a judgment against the Estate of Pierre Scott. He asserted claims under federal criminal statutes, civil RICO, 42 U.S.C. § 1983, the Fourth, Fifth, and Fourteenth Amendments, and the Louisiana Constitution. He also alleged that a towing company or parish personnel took his truck without providing the administrative hearing he believed was required by Louisiana law.

PROCEDURAL HISTORY

The complaint asserted claims against numerous individuals and entities arising from a state-court hearing and the seizure or towing of property. The matter was referred to the undersigned under 28 U.S.C. § 636(b) and Local Rule 72.1(B)(1). The court found plaintiff financially unable to pay the filing fee, but concluded that the complaint appeared subject to dismissal as frivolous or for failure to state a claim and issued a show cause order rather than dismissing it immediately.

DISPOSITION

other

CASES CITED

- Prows v. Kastner, 842 F.2d 138, 140 (5th Cir. 1988)
- Gibbs v. Jackson, 92 F.4th 566, 569 (5th Cir. 2024)
- Adkins v. E.I. DuPont de Nemours & Co., 335 U.S. 331, 339 (1948)
- Moore v. McDonald, 30 F.3d 616, 621 (5th Cir. 1994)
- James v. Richardson, 344 F. App'x 982, 983 (5th Cir. 2009)
- Newsome v. EEOC, 301 F.3d 227, 231 (5th Cir. 2002)
- Startii v. United States, 415 F.2d 1115, 1116 (5th Cir. 1969)
- Adepegba v. Hammons, 103 F.3d 383, 387 (5th Cir. 1996)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Farguson v. MBank Hou., N.A., 808 F.2d 358, 359 (5th Cir. 1986)
- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Davis v. Scott, 157 F.3d 1003, 1005 (5th Cir. 1998)
- Moore v. Mabus, 976 F.2d 268, 270 (5th Cir. 1992)
- Denton v. Hernandez, 504 U.S. 25, 32-33 (1992)

- Garrett v. Thaler, 560 F. App'x 375, 377 (5th Cir. 2014)
- Linda R.S. v. Richard D., 410 U.S. 614, 619 (1973)
- Robertson v. U.S. ex rel. Watson, 560 U.S. 272, 278 (2010)
- United States v. Nixon, 418 U.S. 683, 693 (1974)
- Lefebure v. D'Aquila, Lefebure v. D'Aquila, 15 F.4th 650, 654 (5th Cir. 2021)
- Delta Truck & Tractor, Inc. v. J.I. Case Co., 855 F.2d 241, 242 (5th Cir. 1988)
- St. Germain v. Howard, 556 F.3d 261, 263 (5th Cir. 2009)
- Crosswell v. Martinez, 120 F.4th 177, 184 (5th Cir. 2024)
- Monell v. Dep't of Soc. Servs. of the City of N.Y., 436 U.S. 658, 690 n.55 (1978)
- Edminston v. La. Small Bus. Dev. Ctr., 931 F.3d 403, 407 (5th Cir. 2019)
- Louisiana v. Estate of Davis, 572 So. 2d 39, 42-43 (La. 1990)
- Victoria W. v. Larpenter, 369 F.3d 475, 482 (5th Cir. 2004)
- Harrington v. Harris, 118 F.3d 359, 365 (5th Cir. 1997)
- Flagg Bros., Inc. v. Brooks, 436 U.S. 149, 156 (1978)
- Bush v. Viterna, 795 F.2d 1203, 1209 (5th Cir. 1986)
- Brennan v. Stewart, 834 F.2d 1248, 1257 (5th Cir. 1987)
- Kerr v. California, 374 U.S. 23, 30 (1963)
- Soldal v. Cook County, 506 U.S. 56, 61 (1992)
- Brigham City v. Stuart, 547 U.S. 398, 403 (2006)
- Jordan v. Fisher, 823 F.3d 805, 810 (5th Cir. 2016)
- Reed v. Goertz, 598 U.S. 230, 236 (2023)
- Zinerman v. Burch, 494 U.S. 113, 125-26 (1990)
- Breath v. Cronvich, 729 F.2d 1006, 1010-11 (5th Cir. 1984)
- Matthews v. Eldridge, 424 U.S. 319, 333, 335 (1976)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)