

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Pyle v. Glenn County Sheriff's Department

Pyle · No. 2:24-cv-02940-TLN-CSK · Decided April 25, 2025

SUMMARY

The United States District Court for the Eastern District of California denied Erik Burdett Pyle’s application to proceed in forma pauperis without prejudice. The court found the application inconsistent and insufficient because it reported no ownership of real property, while the complaint indicated that Plaintiff owned a farm and/or ranch, and allowed 30 days to file a renewed application.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 25, 2025
DOCKET	2:24-cv-02940-TLN-CSK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for leave to proceed in forma pauperis in a civil-rights action. The district court denied the application without prejudice.
STANDARD OF REVIEW	The court evaluated whether plaintiff's affidavit satisfied the requirements of 28 U.S.C. § 1915(a)(1) and adequately demonstrated inability to pay the filing fee.
PRECEDENTIAL VALUE	unpublished
PARTIES	Erik Burdett Pyle v. Glenn County Sheriff's Department, et al.

TOPICS

civil procedure

PRACTICE AREAS

civil procedure civil rights

QUESTIONS PRESENTED

1. Whether plaintiff's inconsistent IFP affidavit sufficiently established that he was unable to pay the filing fee under 28 U.S.C. § 1915(a)(1).

HOLDINGS

1. An IFP application may be denied when the applicant's affidavit is inconsistent with statements in the complaint concerning assets and therefore does not adequately establish inability to pay the filing fee.

KEY QUOTATIONS

“The affidavit must provide “sufficient details concerning [the applicant’s] income, assets, and expenditures[.]”” (at 1)

“Plaintiff’s IFP application will be denied without prejudice because Plaintiff’s IFP affidavit is inconsistent and insufficient.” (at 2)

FACTUAL BACKGROUND

Plaintiff's IFP application stated that he received no wages or other income during the preceding twelve months and had no money in checking or savings accounts. He also reported no real property, regular expenses, dependents, debts, or other assets. In contrast, the complaint stated that he owned a farm and/or ranch, creating an inconsistency concerning his assets.

PROCEDURAL HISTORY

Plaintiff filed this action and an application to proceed in forma pauperis under 28 U.S.C. § 1915. The court found that the financial information in the affidavit was inconsistent with allegations in the complaint concerning plaintiff's ownership of a farm and/or ranch. The court denied the application without prejudice and allowed plaintiff thirty days to file a renewed application.

DISPOSITION

other

CASES CITED

- Andrews v. Cervantes, 493 F.3d 1047, 1051 (9th Cir. 2007)
- Rodriguez v. Cook, 169 F.3d 1176, 1177 (9th Cir. 1999)
- Williams v. County of Ventura, 443 F. App'x 232, 233 (9th Cir. 2011)
- United States v. McQuade, 647 F.2d 938, 940 (9th Cir. 1981)
- Strojnik v. Panera Bread Company, 2022 WL 2287274, at *3 (E.D. Cal. June 24, 2022)
- Strojnik v. Panera Bread Company, 2022 WL 2609456 (E.D. Cal. July 8, 2022)