

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

James Belfor v. CFG Health Services, et al.

Civil Action No. 25-17812 (GC) · No. 3:25-cv-17812 · Decided December 4, 2025

SUMMARY

The United States District Court for the District of New Jersey administratively terminated James Belfor’s civil rights action because his in forma pauperis application was unsigned. The court gave him 30 days to submit a complete, signed application with a certified six-month prison account statement or pay the full filing and administrative fee, and explained that administrative termination was not a dismissal for statute-of-limitations purposes.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	George W. Castner
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	December 4, 2025
DOCKET	3:25-cv-17812
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a pro se pretrial detainee, filed a civil-rights complaint and applied to proceed in forma pauperis. The district court considered the incomplete IFP application before directing the Clerk to file the complaint.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district court memorandum and order

TOPICS

- civil procedure
- prisoners rights
- civil rights
- section 1983

PRACTICE AREAS

- civil procedure
- prisoner civil rights
- in forma pauperis procedure

QUESTIONS PRESENTED

- Whether the court should administratively terminate the action when a prisoner submits an unsigned IFP application and has not paid the filing fee.

2. Whether Plaintiff should be given an opportunity to reopen the action by submitting a complete signed IFP application with the required certified six-month prison account statement or by paying the full \$405 fee.

HOLDINGS

1. When a prisoner submits an unsigned and therefore incomplete application to proceed in forma pauperis and has not paid the required filing fee, the court may administratively terminate the action without filing the complaint or assessing a fee, while allowing the prisoner an opportunity to cure the deficiency.
2. Plaintiff may reopen the action within 30 days by notifying the court in writing and submitting either a complete signed IFP application with a certified six-month prison account statement or the full \$405 fee.

KEY QUOTATIONS

“The Clerk shall ADMINISTRATIVELY TERMINATE this matter, without filing the Complaint or assessing a fee;” (Memorandum & Order)

“Plaintiff is advised that administrative termination is not a “dismissal” for purposes of the statute of limitations” (Memorandum & Order)

FACTUAL BACKGROUND

James Belfor, a pretrial detainee proceeding pro se, submitted a civil-rights complaint in the District of New Jersey. He also submitted an application to proceed in forma pauperis, but the application was unsigned and lacked the required completed affidavit. Plaintiff had not paid the \$405 filing and administrative fee.

PROCEDURAL HISTORY

Plaintiff submitted a civil-rights complaint and an IFP application, but failed to sign the application. Because Plaintiff neither paid the required fee nor submitted a complete signed IFP application, the court administratively terminated the action without filing the complaint or assessing a fee, while allowing Plaintiff 30 days to cure the deficiency or pay the full fee.

DISPOSITION

other

CASES CITED

- Papotto v. Hartford Life & Accident Insurance Co., 731 F.3d 265, 275 (3d Cir. 2013)
- Jenkins v. Superintendent of Laurel Highlands, 705 F.3d 80, 84 n.2 (3d Cir. 2013)
- Dasilva v. Sheriff's Department, 413 F. App'x 498, 502 (3d Cir. 2011) (per curiam)

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