

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
OKLAHOMA

Oscar Brownfield v. Cherokee County School District No. 35

Brownfield · No. CIV-21-312-GLJ · Decided March 19, 2026

SUMMARY

The United States District Court for the Eastern District of Oklahoma sanctioned pro se plaintiff Oscar Brownfield under Federal Rule of Civil Procedure 11 for filing a sanctions motion containing fictitious and inaccurate case citations generated with assistance from artificial intelligence. The court imposed a \$500 sanction payable to the defendant, finding it was the least severe sanction adequate to punish the conduct and deter recurrence.

CASE DETAILS

COURT	United States District Court for the Eastern District of Oklahoma
WRITING FOR THE COURT	Gerald L. Jackson
JURISDICTION	United States District Court for the Eastern District of Oklahoma
DECIDED	March 19, 2026
DOCKET	CIV-21-312-GLJ
DISPOSITION	other
PROCEDURAL POSTURE	The court sua sponte ordered Plaintiff to show cause why sanctions should not be imposed under Federal Rule of Civil Procedure 11 for filing a sanctions motion containing fictitious and inaccurate case citations. After a show-cause hearing, the court imposed a \$500 sanction payable to Defendant.
STANDARD OF REVIEW	Rule 11 compliance is evaluated under an objective-reasonableness standard, asking whether a reasonable attorney or pro se litigant would have filed the document after a reasonable inquiry into the facts and law. The court has significant discretion in selecting an appropriate sanction.
PRECEDENTIAL VALUE	district court opinion; precedential status not stated
PARTIES	Oscar Brownfield v. Cherokee County School District No. 35

TOPICS

sanctions

civil procedure

civil rights

PRACTICE AREAS

civil procedure

legal ethics and professional responsibility

civil rights

QUESTIONS PRESENTED

1. Whether Plaintiff's filing of a sanctions motion containing fictitious or inaccurate case citations, after failing to verify AI-generated legal research, violated Federal Rule of Civil Procedure 11(b)(2).
2. Whether a subjective bad-faith finding was required before imposing Rule 11 sanctions.
3. What sanction was appropriate under Rule 11(c)(4) in light of the inaccurate citations, Plaintiff's pro se status, candor, remedial measures, and the claimed defense fees.

HOLDINGS

1. A pro se litigant violates Rule 11(b)(2) by filing a pleading containing fictitious or materially inaccurate case citations without conducting a reasonable inquiry into the law, including when the citations resulted from unverified generative-AI research.
2. A finding of subjective bad faith is not required to impose Rule 11 sanctions.
3. The appropriate Rule 11 sanction was \$500, rather than the full \$7,032 claimed by Defendants, because the court could not determine how much of the claimed fee was attributable exclusively to the fictitious or inaccurate citations.

KEY QUOTATIONS

"The central purpose of Rule 11 is to deter baseless filings in district court." (Section II)

"Therefore, the Court finds the Plaintiff's submission of a pleading containing fictitious cases and inaccurate cases references warrants sanctions." (Section II.A)

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, filed a Rule 11 sanctions motion concerning Defendants' motion for summary judgment. The motion contained eight authorities that were nonexistent, inaccurately quoted, or did not support the propositions for which they were cited. Plaintiff admitted using a generative AI tool to assist with legal research and failing to verify the citations. Defendants submitted evidence that they incurred \$7,032 in fees responding to the sanctions motion, but the court found that the portion attributable specifically to the inaccurate citations was unclear.

PROCEDURAL HISTORY

Plaintiff filed a Rule 11 sanctions motion alleging that Defendants' summary-judgment motion contained unsupported and false factual contentions. Defendants responded by identifying fictitious or inaccurately characterized authorities in Plaintiff's motion and sought recovery of fees and costs. The court issued a show-

cause order, held a hearing on March 17, 2026, considered Plaintiff's admission that he used generative artificial intelligence without verifying the citations, and imposed a \$500 sanction.

DISPOSITION

other

CASES CITED

- *Bus. Guides, Inc. v. Chromatic Commc'ns Enters., Inc.*, 498 U.S. 533, 542 (1991)
- *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990)
- *Adamson v. Bowen*, 855 F.2d 668, 672 (10th Cir. 1988)
- *Collins v. Daniels*, 916 F.3d 1302, 1319-20 (10th Cir. 2019)
- *Predator Int'l, Inc. v. Gamo Outdoor USA, Inc.*, 793 F.3d 1177, 1182 (10th Cir. 2015)
- *Grays v. Blackhawk Acquisitions, LLC*, 2024 WL 3179541, at *1 (D. Colo. June 26, 2024)
- *Ridder v. City of Springfield*, 109 F.3d 288, 293 (6th Cir. 1997)
- *Chumpitaz-Morales v. Bondi*, 2026 WL 382144, at *4 (10th Cir. Feb. 11, 2026)
- *Harris v. Take-Two Interactive Software, Inc.*, 2025 WL 1310122, at *2 (D. Colo. May 6, 2025)
- *Rasmussen v. Burnett*, 2025 WL 808364, at *3 (D. Colo. Mar. 12, 2025)
- *Green v. Dorrell*, 969 F.2d 915, 917 (10th Cir. 1992)
- *Hall v. Bellmon*, 935 F.2d 1106, 1110 (10th Cir. 1991)
- *Garrett v. Selby Connor Maddux & Janer*, 425 F.3d 836, 840 (10th Cir. 2005)
- *Nielsen v. Price*, 17 F.3d 1276, 1277 (10th Cir. 1994)
- *Mattox v. Product Innovations Research, LLC*, 807 F. Supp. 3d 1341, 1347 (E.D. Okla. 2025)
- *Hill v. Oklahoma*, 2025 WL 1840659, at *4 (W.D. Okla. July 3, 2025)
- *Wadsworth v. Walmart*, 348 F.R.D. 489, 495-96 (D. Wyo. 2025)
- *Bunce v. Visual Technology Innovations, Inc.*, 2025 WL 662398, at *1 (E.D. Pa. Feb. 27, 2025)
- *Ramirez v. Humala*, 2025 WL 1384161, at *1 (E.D.N.Y. May 13, 2025)
- *Burkhart ex rel. Meeks v. Kinsley Bank*, 804 F.2d 588, 589-90 (10th Cir. 1986)
- *White v. Gen. Motors Corp.*, 908 F.2d 675, 683-84 (10th Cir. 1990)
- *King v. Fleming*, 899 F.3d 1140, 1148 (10th Cir. 2018)
- *Doering v. Union Cnty. Bd. of Chosen Freeholders*, 857 F.2d 191, 195 (3d Cir. 1988)
- *Cabell v. Petty*, 810 F.2d 463, 466-67 (4th Cir. 1987)

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