

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Nathaniel Darrell Taylor v. Sheila Turner-McCall, et al.

Taylor · No. 1:25 CV 2508 · Decided January 6, 2026

SUMMARY

The United States District Court for the Northern District of Ohio dismissed Nathaniel Darrell Taylor’s pro se civil rights action against state and local judicial, prosecutorial, and law-enforcement defendants. The court held that the complaint failed to satisfy basic pleading requirements and that Taylor’s arguments, which reflected sovereign-citizen ideology concerning driver’s-license and statutory obligations, were frivolous and lacked an arguable basis in law. The court also denied Taylor’s second motion for a temporary restraining order and certified that an appeal could not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Patricia A. Gaughan
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 6, 2026
DOCKET	1:25 CV 2508
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se plaintiff filed a fee-paid civil rights action seeking injunctive and monetary relief, along with two motions for temporary restraining orders. The district court denied the second temporary-restraining-order motion and dismissed the action sua sponte under Apple v. Glenn.
STANDARD OF REVIEW	The court liberally construed the pro se complaint and applied the limited sua sponte screening standard under Apple v. Glenn, permitting dismissal of a fee-paid, nonprisoner complaint that is totally implausible, attenuated, unsubstantial, frivolous, devoid of merit, or lacking an arguable basis in law, including where subject-matter jurisdiction is absent.

TOPICS

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QUESTIONS PRESENTED

1. Whether the complaint satisfied minimum pleading requirements by providing defendants fair notice of the legal claims and factual grounds supporting them.
2. Whether the complaint's sovereign-citizen theories had an arguable basis in law or were frivolous under the court's sua sponte screening authority.
3. Whether the second motion for a temporary restraining order should be granted.

HOLDINGS

1. The complaint failed to satisfy basic pleading requirements because it contained no factual allegations, did not identify specific legal claims or constitutional rights, and did not provide defendants fair notice of the claims and grounds for relief.
2. The complaint was frivolous and lacked an arguable basis in law because the plaintiff's sovereign-citizen assertions did not exempt him from complying with federal, state, or local laws, including driver-licensing requirements.
3. The second motion for a temporary restraining order was denied because it concerned events unrelated to the complaint and there was no indication that any defendant was involved.

KEY QUOTATIONS

"Plaintiff's rhetoric fails to establish a viable legal claim with an arguable basis in law, and is "totally implausible, attenuated, unsubstantial, frivolous, devoid of merit, or no longer open to discussion"" (at 4)

FACTUAL BACKGROUND

Taylor received a traffic citation in Cleveland in October 2024 for driving on a suspended or revoked license. He asserted that he had relinquished his driver's license and identification documents and that declarations of nonconsent and sovereign status exempted him from federal, state, and local laws. He sought injunctive and monetary relief, including protection from detention, and claimed that a UCC-1 financing statement created a \$77 million lien against each defendant.

PROCEDURAL HISTORY

Taylor filed a complaint against state and local judicial, prosecutorial, law-enforcement, and governmental defendants, asserting violations of 42 U.S.C. §§ 1983 and 1985 and 18 U.S.C. §§ 241, 242, and 4. The complaint

contained no factual allegations or specific constitutional claims and was supported by exhibits concerning a traffic citation and sovereign-citizen theories. The court previously denied the first motion for a temporary restraining order, denied the second motion because it concerned unrelated events involving no apparent defendant, and dismissed the action as insufficiently pleaded and frivolous.

DISPOSITION

dismissed

CASES CITED

- Spotts v. United States, 429 F.3d 248, 250 (6th Cir. 2005)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Apple v. Glenn, 183 F.3d 477, 479-80 (6th Cir. 1999)
- Hagans v. Lavine, 415 U.S. 528, 536-37 (1974)
- Neitzke v. Williams, 490 U.S. 319 (1989)
- Sistrunk v. City of Strongsville, 99 F.3d 194, 197 (6th Cir. 1996)
- Lawler v. Marshall, 898 F.2d 1196 (6th Cir. 1990)
- Laster v. Pramstaller, No. 08-CV-10898, 2008 WL 1901250, at *2 (E.D. Mich. Apr. 25, 2008)
- Windsor v. Colorado Dep't of Corr., 9 F. App'x 967, 968 (10th Cir. 2001)
- Bassett v. National Collegiate Athletic Ass'n, 528 F.3d 426, 437 (6th Cir. 2008)
- Dunn v. Post, No. 21-1412, 2022 WL 1297586, at *2 (6th Cir. Jan. 27, 2022)
- United States v. Warfield, 404 F. App'x 994, 996 (6th Cir. 2011)
- Joyce-Simpson v. AT&T Mobility, No. 1:23 CV 1216, 2023 WL 8248061, at *3 (W.D. Tenn. Nov. 7, 2023)
- Burnett v. Michigan, No. 1:24-CV-55, 2024 WL 3721741, at *6-7 (W.D. Mich. June 18, 2024)