

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Presidential Candidate Number P60005535 (also known as Ronald Satish Emrit) & Presidential Committee/Political Action Committee/Separate Segregated Fund (SSF) Number C00569897 d/b/a United Emrits of America v. Former President Barack Hussein Obama (BHO), Michelle Obama, Former President Joe Biden, Jill Biden, Hunter Biden, Supreme Court Justice Ketanji Brown-Jackson, Former Prince Andrew of the Windsors, British Prime Minister Keir Starmer

Emrit v. Obama · No. 1:26-cv-00219-DCN · Decided May 15, 2026

SUMMARY

The United States District Court for the District of Idaho denies as moot the plaintiff’s application to proceed in forma pauperis and dismisses the complaint without leave to amend. The court finds the complaint frivolous, difficult to understand, and insufficient to state a claim under 28 U.S.C. § 1915(e) (2). The court also concludes that the notice of interlocutory appeal is ineffective because no judgment had been entered.

CASE DETAILS

COURT	United States District Court for the District of Idaho
JURISDICTION	United States District Court for the District of Idaho
DECIDED	May 15, 2026
DOCKET	1:26-cv-00219-DCN
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court conducted an initial review of a pro se complaint filed with an application to proceed in forma pauperis and a notice of interlocutory appeal.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that is frivolous or malicious, fails to state a claim upon which relief can be granted, or seeks monetary relief from an immune defendant. A complaint must contain sufficient factual matter

	to state a plausible claim for relief, and conclusory allegations are insufficient.
PRECEDENTIAL VALUE	unpublished district court memorandum decision
PARTIES	Presidential Candidate Number P60005535 (also known as Ronald Satish Emrit), Presidential Committee/Political Action Committee/Separate Segregated Fund (SSF) Number C00569897 d/b/a United Emrits of America v. Former President Barack Hussein Obama (BHO), Michelle Obama, Former President Joe Biden, Jill Biden, Hunter Biden, Supreme Court Justice Ketanji Brown-Jackson, Former Prince Andrew of the Windsors, British Prime Minister Keir Starmer

TOPICS

pleadings civil procedure appellate procedure standard of review

PRACTICE AREAS

civil procedure federal pleading in forma pauperis screening appellate procedure

QUESTIONS PRESENTED

1. Whether the plaintiff established indigence sufficient to proceed in forma pauperis.
2. Whether the complaint was frivolous or failed to state a claim under 28 U.S.C. § 1915(e)(2)(B).
3. Whether the complaint should be dismissed without leave to amend because amendment could not cure its defects.
4. Whether the notice of interlocutory appeal was effective when filed before entry of judgment.

HOLDINGS

1. The plaintiff did not establish that he was unable to pay the filing fee because his application showed discretionary monthly income and funds in a checking account.
2. The complaint was frivolous and failed to state a claim because it presented incomprehensible, fantastical allegations and no cognizable facts or legal theories sufficient to support relief.
3. Dismissal without leave to amend was proper because it was absolutely clear that amendment could not cure the complaint's defects.
4. The notice of interlocutory appeal was ineffective because it was filed before any judgment had been entered.

KEY QUOTATIONS

“*Satish’s Complaint is DISMISSED without leave to amend.*” (Section I)

“*These allegations cannot withstand scrutiny.*” (Section IV.B)

“Satish’s Complaint is incurably insufficient, and this case must be closed.” (Section V)

FACTUAL BACKGROUND

Plaintiff Satish Emrit filed a complaint naming multiple public figures and seeking \$500 billion in damages. The complaint referred to his interview on the Kelly Clarkson Show, his book, a letter from the Florida Secretary of State, and allegations that former President Obama was a clandestine spy conducting espionage against him. The court found the allegations difficult to understand, fantastical, and unsupported by cognizable facts or legal theories.

PROCEDURAL HISTORY

Plaintiffs filed a complaint, an application to proceed in forma pauperis, and a notice of interlocutory appeal before entry of judgment. The district court denied the in forma pauperis application as moot, dismissed the complaint without leave to amend after screening under 28 U.S.C. § 1915(e)(2), deemed the interlocutory appeal notice ineffective because no judgment had yet been entered, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Rice v. City of Boise City, 2013 WL 6385657, at *1 (D. Idaho Dec. 6, 2013)
- Emrit v. Cheap-O-Air, 2013 WL 12113179 (D. Md. Apr. 1, 2013), aff’d, 533 F. App’x 347 (4th Cir. 2013)
- Emrit v. Marion Cnty. Hous. Auth. (MCHA), 2017 WL 743882 (D. Or. Feb. 23, 2017)
- Emrit v. Sec’y of State, Rhode Island, 2017 WL 3209232 (D.R.I. Feb. 27, 2017)
- Emrit v. Progressive Ins. Co., 2024 WL 436385 (N.D. Fla. Jan. 11, 2024), report and recommendation adopted, 2024 WL 420143 (N.D. Fla. Feb. 5, 2024), appeal dismissed, 2024 WL 3664060 (11th Cir. Mar. 4, 2024)
- Adkins v. E.I. DuPont de Nemours & Co., 335 U.S. 331, 339 (1948)
- United States v. McQuade, 647 F.2d 938, 940 (9th Cir. 1981)
- Jefferson v. United States, 277 F.2d 723, 725 (9th Cir. 1960)
- Lopez v. Smith, 203 F.3d 1122, 1129 (9th Cir. 2000)
- Resnick v. Hayes, 213 F.3d 443, 447 (9th Cir. 2000)
- Pena v. Gardner, 976 F.2d 469, 471 (9th Cir. 1992)
- Jackson v. Carey, 353 F.3d 750, 758 (9th Cir. 2003)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Neitzke v. Williams, 490 U.S. 319, 327-28 (1989)
- Molski v. Evergreen Dynasty Corp., 500 F.3d 1047, 1061 (9th Cir. 2007)
- Emrit v. Obama, 2026 WL 1021173, at *1 (D.S.D. Apr. 15, 2026)

OPINION

Obama

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

PRESIDENTIAL CANDIDATE

NUMBER P60005535 “also known as” Case No. 1:26-cv-00219-DCN (aka) Ronald Satish Emrit, & Presidential Committee/Political Action MEMORANDUM DECISION AND Committee/Separate Segregated Fund ORDER (SSF) Number C00569897 d/b/a United Emrits of America, Plaintiffs, v.

FORMER PRESIDENT BARACK

HUSSEIN OBAMA (BHO), MICHELLE

OBAMA, FORMER PRESIDENT JOE

BIDEN, JILL BIDEN, HUNTER BIDEN,

SUPREME COURT JUSTICE KETANJI

BROWN-JACKSON, FORMER PRINCE

ANDREW OF THE WINDSORS,

BRITISH PRIME MINISTER KEIR

STARMER,

Defendants.

I. INTRODUCTION

The Plaintiffs in this case are actually all one man the Court will refer to as Satish. Before the Court is Satish’s Complaint (Dkt. 2), Application for Leave to Proceed in Forma Pauperis (Dkt. 1), and Notice of Interlocutory Appeal (Dkt. 4). Under 28 U.S.C. § 1915, the Court must review Satish’s request to determine whether he is entitled to proceed in forma pauperis—which permits civil litigants to proceed without prepayment of the filing fee or to pay the filing fee over time. *Rice v. City of Boise City*, 2013 WL 6385657, at *1 (D. Idaho Dec. 6, 2013). The Court must also undertake an initial review of Satish’s Complaint to ensure it meets the minimum required standards. See 28 U.S.C. § 1915(e)(2). For the reasons explained below, Satish’s Application for Leave to Proceed in Forma Pauperis is DENIED as MOOT. Satish’s Complaint is DISMISSED without leave to amend. Satish’s Notice of Interlocutory Appeal is ineffective as no judgment has been entered in this case prior to the notice being filed; the Court will not address this notice further.

II. BACKGROUND

Satish is a musician and a serial litigant who has filed frivolous complaints for over a decade across the entire United States. See, e.g., *Emrit v. Cheap-O-Air*, 2013 WL 12113179 (D. Md. Apr. 1, 2013), *aff’d*, 533 F. App’x 347 (4th Cir. 2013); *Emrit v. Marion Cnty. Hous. Auth. (MCHA)*, 2017 WL 743882 (D. Or. Feb. 23, 2017); *Emrit v. Sec’y of State, Rhode Island*, 2017 WL 3209232

(D.R.I. Feb. 27, 2017); *Emrit v. Progressive Ins. Co.*, 2024 WL 436385 (N.D. Fla. Jan. 11, 2024), report and recommendation adopted, 2024 WL 420143 (N.D. Fla. Feb. 5, 2024), appeal dismissed, 2024 WL 3664060 (11th Cir. Mar. 4, 2024).¹ This case follows the trend of Satish’s other cases as the Complaint is difficult, if at all possible, to understand. In his Complaint, Satish discusses his interview by the “senior producer of the Kelly Clarkson Show,” his book “The Can’tidates” which was “endorsed by People Magazine and David Duchovny of The Red Shoe Diaries,” and his letter from 1 This is but a handful of the hundreds of cases and appeals Satish has filed over the years in various states. Additional cases are cited later in this decision. the Florida Secretary of State. Dkt. 2, at 4-5. It is unclear how those facts relate to any legitimate legal cause of action, but Satish ultimately alleges former President Obama has committed various crimes against him and requests 500 billion dollars in damages. *Id.* at 5-6.

III. LEGAL STANDARD

A. Application to Proceed In Forma Pauperis “[A]ny court of the United States may authorize the commencement, prosecution or defense of any suit, action or proceeding, civil or criminal, . . . without prepayment of fees or security therefor.” 28 U.S.C. § 1915(a)(1). To qualify for in forma pauperis status, a plaintiff must submit an affidavit that includes a statement of all assets she possesses and indicates that she is unable to pay the fee required. The affidavit is sufficient if it states that the plaintiff, because of her poverty, cannot “pay or give security for the costs” and still be able to provide for herself and dependents “with necessities of life.” *Adkins v. E.I. DuPont de Nemours & Co.*, 335 U.S. 331, 339 (1948). The affidavit must “state the facts as to affiant’s poverty with some particularity, definiteness and certainty.” *United States v. McQuade*, 647 F.2d 938, 940 (9th Cir. 1981) (citation modified) (quoting *Jefferson v. United States*, 277 F.2d 723, 725 (9th Cir. 1960)). B. Sufficiency of Complaint The Court is required to screen complaints that are brought by litigants who seek in forma pauperis status. See 28 U.S.C. § 1915(e)(2); see also *Lopez v. Smith*, 203 F.3d 1122, 1129 (9th Cir. 2000) (“[S]ection 1915(e) applies to all in forma pauperis complaints, not just those filed by prisoners”). The Court must dismiss a plaintiff’s complaint, or any portion thereof, if it: (1) is frivolous or malicious; (2) fails to state a claim upon which relief can be granted; or (3) seeks monetary relief from a defendant who is immune from such relief. See 28 U.S.C. § 1915(e)(2)(B)(i-iii). To state a claim upon which relief can be granted, a plaintiff’s complaint must include facts sufficient to show a plausible claim for relief. See *Ashcroft v. Iqbal*, 556 U.S. 662, 677-78 (2009) (citing *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)). The plaintiff cannot simply recite the elements of a cause of action and try to support that recitation with mere conclusory statements. *Id.* at 678. During this initial review, courts generally construe pro se pleadings liberally, giving pro se plaintiffs the benefit of any doubt. See *Resnick v. Hayes*, 213 F.3d 443, 447 (9th Cir. 2000). Even so, plaintiffs—whether represented or not—have the burden of articulating their claims clearly and alleging facts sufficient to support review of each claim. *Pena v. Gardner*, 976 F.2d 469, 471 (9th Cir. 1992). Additionally, if amending the complaint would remedy the deficiencies, plaintiffs should be notified and provided an opportunity to amend.

See *Jackson v. Carey*, 353 F.3d 750, 758 (9th Cir. 2003).

IV. DISCUSSION

A. Application to Proceed In Forma Pauperis The Court has examined Satish's application to proceed in forma pauperis and finds it does not establish his indigence. Satish lists his monthly income as \$1,036.00, and his monthly expenses as \$790.00. Dkt. 1, at 2, 4. Moreover, \$100 of Satish's monthly expenses are spent on recreation, entertainment, newspapers, magazines, etc. Id. at 3. In short, Satish has approximately \$346 in discretionary income each month. Satish also has \$357.30 in a checking account. Id. at 2. Thus, the Court determines Satish is not indigent and cannot proceed without pre-payment of the filing fee. However, as explained below, Satish's Complaint is DISMISSED, so the Application to Proceed In Forma Pauperis is DENIED as MOOT and no filing fee will be required.

B. Sufficiency of Complaint At face value, Satish's complaint cannot survive an initial analysis under the first two prongs of 28 U.S.C. § 1915(e)(2): (1) the complaint is frivolous or malicious; (2) the complaint fails to state a claim upon which relief can be granted. See 28 U.S.C. § 1915(e)(2)(B)(i-ii). Specifically addressing the first prong, Satish's complaint is frivolous. It is difficult to understand what, if anything, he is alleging. There are limited facts or cognizable legal theories. Moreover, what Satish does allege is the definition of "fantastical"—that former President Obama is a clandestine spy working through podcasts and other mediums to conducting espionage against him. These allegations cannot withstand scrutiny. *Neitzke v. Williams*, 490 U.S. 319, 327-28 (1989) (noting a complaint is frivolous if its factual allegations are "clearly baseless," "fantastic," or "delusional"); *Molski v. Evergreen Dynasty Corp.*, 500 F.3d 1047, 1061 (9th Cir. 2007) (noting that a plaintiff "may cross the line into frivolous litigation by asserting facts that are grossly exaggerated or totally false"). Beyond the senseless claims presented in the Complaint, Satish is a serial litigant, who has filed substantially the same complaint as here in at least twenty-eight other districts. See *Emrit v. Obama*, 2026 WL 1021173, at *1 (D.S.D. Apr. 15, 2026) (collecting cases). The Court agrees with the opinions of those courts which reached the same conclusion: Satish's Complaint is frivolous, and it is absolutely clear that no amendment will cure the defects so the Complaint should be DISMISSED without leave to amend.

V. CONCLUSION

Satish's application to proceed in forma pauperis does not establish his indigency; even so, the application is moot because the Complaint is DISMISSED without leave to amend. Satish's Complaint is incurably insufficient, and this case must be closed.

VI. ORDER

1. Satish's Application for Leave to Proceed in Forma Pauperis (Dkt. 1) is DENIED as MOOT.
2. After an initial review of the Complaint, the Court will not allow Satish to proceed with his claims against Defendants. Satish's Complaint is DISMISSED without leave to amend.

3. The case is CLOSED.

Le DATED: May 15, 2026 TM JU tt fjyf ast U8. Disithce Court Judge

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