

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
DAKOTA, CENTRAL DIVISION

Ronald Satish Emrit v. Senator John Thune, Senator Susan Collins,
Senator Joni Ernst, Senator Lisa Murkowski, and Congresswoman
Marjorie Taylor Greene

No. 3:25-CV-03015-RAL (D.S.D. May 11, 2026) · No. 3:25-CV-03015-RAL · Decided May 11, 2026

SUMMARY

The United States District Court for the District of South Dakota grants Ronald Satish Emrit leave to proceed in forma pauperis and conducts screening under 28 U.S.C. § 1915(e)(2). The court dismisses the complaint with prejudice, concluding that the defendants are protected by the Speech or Debate Clause for legislative acts, the remaining claims are frivolous or fail to state a claim, the action is duplicative of litigation filed elsewhere, and venue is improper. The order also denies a second in forma pauperis motion as moot.

CASE DETAILS

COURT	United States District Court for the District of South Dakota, Central Division
WRITING FOR THE COURT	Roberto A. Lange
JURISDICTION	United States District Court for the District of South Dakota, Central Division
DECIDED	May 11, 2026
DOCKET	3:25-CV-03015-RAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff sought leave to proceed in forma pauperis and asserted tort, civil-rights, and constitutional claims against members of Congress. The district court granted the initial in forma pauperis motion, screened the complaint under 28 U.S.C. § 1915(e)(2), and dismissed the complaint with prejudice.
STANDARD OF REVIEW	On § 1915(e)(2) screening, the court accepted well-pleaded factual allegations as true and liberally construed the pro se complaint, while requiring specific facts supporting the asserted legal conclusions and dismissing claims that were frivolous, failed to state a claim, or sought monetary relief from immune defendants.

PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Ronald Satish Emrit v. Senator John Thune, Senator Susan Collins, Senator Joni Ernst, Senator Lisa Murkowski, Congresswoman Marjorie Taylor Greene

TOPICS

civil procedure

venue

subject matter jurisdiction

constitutional law

civil rights

PRACTICE AREAS

civil procedure

constitutional law

civil rights

federal courts

remedies

QUESTIONS PRESENTED

1. Whether Emrit was entitled to proceed in forma pauperis despite his history of repetitive and allegedly abusive litigation.
2. Whether claims arising from members of Congress's legislative activities were barred by the Speech or Debate Clause.
3. Whether the complaint stated a legally cognizable claim against individual members of Congress for failing to provide employment, housing assistance, or public benefits.
4. Whether the complaint was frivolous or sought relief from immune defendants under 28 U.S.C. § 1915(e)(2)(B).
5. Whether dismissal was warranted because the action was duplicative of parallel federal lawsuits and venue was improper.

HOLDINGS

1. A district court may grant in forma pauperis status and nevertheless screen the complaint under 28 U.S.C. § 1915(e)(2); the court granted Emrit's first motion, denied the second as moot, and proceeded with screening.
2. Members of Congress are absolutely immune under the Speech or Debate Clause from civil claims based on actions within the sphere of legitimate legislative activity.
3. The complaint failed to state a claim and was frivolous because individual members of Congress had no legal duty to obtain employment or Section 8 housing for Emrit, and the asserted Fair Housing Act and Americans with Disabilities Act theories did not properly run against these defendants.
4. A federal action may be dismissed when it is duplicative of parallel federal litigation involving the same party and controversy.
5. The District of South Dakota was not a proper venue because Emrit did not allege that all defendants resided there or that his claims arose there, apart from the possible exception of Senator Thune.

KEY QUOTATIONS

“Courts have ‘a duty to deny in forma pauperis status to those individuals who have abused the system.’” (at 3)

“Without exception,” the Supreme Court of the United States has “read the Speech or Debate Clause broadly to effectuate its purposes.” (at 8)

“Plaintiffs may not pursue multiple federal suits against the same party involving the same controversy at the same time.” (at 10)

FACTUAL BACKGROUND

Emrit alleged that members of Congress were responsible for proposed legislation affecting Medicaid, Medicare, SNAP/EBT, Section 8 housing, and TANF benefits. He also alleged that the defendants failed to offer him employment at a Maryland college or university and failed to provide him with a Section 8 housing voucher. He sought \$45 million in damages and injunctions requiring the provision of housing and public benefits and assistance in obtaining employment.

PROCEDURAL HISTORY

Emrit filed the action and two motions for leave to proceed in forma pauperis. The court granted the first motion, denied the second as moot, and conducted mandatory screening under § 1915(e)(2). The court dismissed the complaint with prejudice because claims based on legislative conduct were barred by the Speech or Debate Clause, remaining claims were frivolous or failed to state a claim, the action was duplicative of parallel federal litigation, and venue was improper.

DISPOSITION

dismissed

CASES CITED

- Lee v. McDonald's Corp., 231 F.3d 456, 459 (8th Cir. 2000)
- Williams v. McKenzie, 834 F.2d 152, 154 (8th Cir. 1987)
- Cross v. Gen. Motors Corp., 721 F.2d 1152, 1157 (8th Cir. 1983)
- In re Sindram, 498 U.S. 177, 180 (1991) (per curiam)
- Presidential Candidate Number P60005535 v. U.S. Pat. & Trademark Off., 2025 WL 3525455, at *1 (S.D. Ill. Dec. 9, 2025)
- Emrit v. Snoop Doggy Dogg, No. 3:26-CV-00007, 2026 WL 1021642, at *2 (D. Alaska Apr. 15, 2026)
- Emrit v. Prince George's Cnty. Police Dep't, No. CV 25-249, 2025 WL 2345179, at *2 (W.D. Pa. Aug. 13, 2025)
- Emrit v. Combs, No. 24-CV-0129, 2024 WL 199548, at *5 (E.D. Pa. Jan. 18, 2024)
- Emrit v. Combs, No. 1:24-CV-129, 2024 WL 1115450 (W.D. Mich. Mar. 14, 2024)
- Emrit v. Cent. Intel. Agency, No. 3:22-CV-35, 2022 WL 1575999, at *1 (N.D. W. Va. Apr. 1, 2022), report and recommendation adopted by 2022 WL 1573175 (N.D. W. Va. May 18, 2022)

- Martin-Trigona v. Stewart, 691 F.2d 856, 857 (8th Cir. 1982) (per curiam)
- Key v. Does, 217 F. Supp. 3d 1006, 1007 (E.D. Ark. 2016)
- Est. of Rosenberg v. Crandell, 56 F.3d 35, 36 (8th Cir. 1995)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Bediako v. Stein Mart, Inc., 354 F.3d 835, 839 (8th Cir. 2004)
- Martin v. Sargent, 780 F.2d 1334, 1337 (8th Cir. 1985)
- Ellis v. City of Minneapolis, 518 F. App'x 502, 504 (8th Cir. 2013) (per curiam)
- Davis v. Hall, 992 F.2d 151, 152 (8th Cir. 1993) (per curiam)
- Parker v. Porter, 221 F. App'x 481, 482 (8th Cir. 2007) (per curiam)
- Williams v. Willits, 853 F.2d 586, 588 (8th Cir. 1988)
- Bramlet v. Wilson, 495 F.2d 714, 716 (8th Cir. 1974)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Beavers v. Lockhart, 755 F.2d 657, 663 (8th Cir. 1985)
- Neitzke v. Williams, 490 U.S. 319, 325, 327 (1989)
- Eastland v. U.S. Servicemen's Fund, 421 U.S. 491, 501-02 (1975)
- Smith v. Eagleton, 455 F. Supp. 403, 405 (W.D. Mo. 1978)
- Doe v. McMillan, 412 U.S. 306, 311-12 (1973)
- Carter v. Schafer, 273 F. App'x 581, 582 (8th Cir. 2008) (per curiam)
- Missouri ex rel. Nixon v. Prudential Health Care Plan, Inc., 259 F.3d 949, 954 (8th Cir. 2001)
- Serlin v. Arthur Andersen & Co., 3 F.3d 221, 223 (7th Cir. 1993)
- Resolution Tr. Corp. v. Sullivan, 772 F. Supp. 449, 450 (E.D. Mo. 1991)
- Trujillo v. Williams, 465 F.3d 1210, 1217 (10th Cir. 2006)

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