

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, FORT SMITH DIVISION

Jonathan Daniel Clements v. The State of Arkansas; The United
States Federal Government; and International Governments and
Religious Bodies

Clements · No. 2:25-cv-02145-TLB · Decided December 30, 2025

SUMMARY

A magistrate judge recommends denying Jonathan Clements’s application to proceed in forma pauperis on appeal. The recommendation concludes that the underlying complaint, which asserted constitutional, statutory, international-law, RICO, and trust-law claims, was frivolous and that the appeal added no legally supported basis for challenging the prior dismissal.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Fort Smith Division
WRITING FOR THE COURT	Mark E. Ford
JURISDICTION	United States District Court for the Western District of Arkansas, Fort Smith Division
DECIDED	December 30, 2025
DOCKET	2:25-cv-02145-TLB
DISPOSITION	other
PROCEDURAL POSTURE	Magistrate judge's report and recommendation on Plaintiff's application to proceed in forma pauperis on appeal after the complaint was screened and dismissed without prejudice as frivolous.
STANDARD OF REVIEW	De novo review of objections to a magistrate judge's report and recommendation; an appeal may not proceed in forma pauperis when it is frivolous. Specific and timely objections are required to trigger de novo review.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Jonathan Daniel Clements v. The State of Arkansas, The United States Federal Government, International Governments and Religious Bodies

TOPICS

appellate procedure civil procedure standard of review section 1983 constitutional law

PRACTICE AREAS

civil procedure appellate procedure civil rights constitutional law

QUESTIONS PRESENTED

1. Whether Clements's application to proceed in forma pauperis on appeal should be denied because the appeal is frivolous.
2. Whether Clements's objections and appellate arguments supplied non-conclusory legal authority or otherwise demonstrated an appealable error in the dismissal of his complaint.

HOLDINGS

1. The application to proceed in forma pauperis on appeal should be denied because Clements's objections and appellate arguments were vague, conclusory, and frivolous.

KEY QUOTATIONS

“Vague and conclusory allegations are frivolous on their face and leave to proceed in forma pauperis has been properly denied in such circumstances.”

FACTUAL BACKGROUND

Clements brought a civil action against Arkansas, the federal government, and international governments and religious bodies, asserting constitutional, statutory, international-law, and trust-law claims. The court characterized the claims as based on sovereign-citizen ideology and found them inherently frivolous. After dismissal without prejudice, Clements sought to appeal in forma pauperis, asserting that the appeal was taken in good faith and challenging the characterization and handling of his claims.

PROCEDURAL HISTORY

Clements filed a complaint alleging violations of 42 U.S.C. § 1983, international-law provisions, RICO, and trust law. Following preservice screening under 28 U.S.C. § 1915(e)(2), the magistrate judge recommended dismissal as frivolous; the district court adopted that recommendation, denied leave to proceed in forma pauperis, and dismissed the complaint without prejudice. After the court denied Clements's motion to reopen, he filed a notice of appeal and an application to proceed in forma pauperis on appeal. The magistrate judge recommended denying that application.

DISPOSITION

other

CASES CITED

- Green v. White, 616 F.2d 1054, 1055 (8th Cir. 1980)
- Meadows v. Gibson, 855 F. Supp. 223 (W.D. Tenn. 1994)
- Price v. McFarland, 133 F. App'x 485 (10th Cir. 2005) (unpublished)

OPINION

Clements

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF ARKANSAS

FORT SMITH DIVISION

JONATHAN DANIEL CLEMENTS PLAINTIFF

v. CIVIL NO. 2:25-cv-02145-TLB THE STATE OF ARKANSAS;

THE UNITED STATES FEDERAL GOVERNMENT; and

INTERNATIONAL GOVERNMENTS AND

RELIGIOUS BODIES DEFENDANTS

MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION

Currently before the Court is Plaintiff's Application to Proceed In Forma Pauperis on appeal. (ECF No. 13, pp. 2-3; ECF No. 14). The matter was referred to the undersigned on December 15, 2025. Plaintiff, Jonathan Clements ("Clements"), filed this action against the Defendants alleging violations of 42 U.S.C. § 1983; Articles 3 and 147 of the Geneva Conventions; Article 17 of the UN Covenant on Civil and Political Rights; the Racketeer Influenced and Corrupt Organizations Act ("RICO"), 18 U.S.C. §§ 1961-1968; and trust law. Pursuant to the provisions of 28 U.S.C. §§ 636(b)(1) and (3), the Honorable Timothy L. Brooks, Chief United States District Judge, referred the case to the undersigned for preservice screening pursuant to 28 U.S.C. § 1915(e)(2). Under this provision, the Court is required to screen any complaint in which a Plaintiff seeks to proceed in forma pauperis. On November 20, 2025, the undersigned filed a Report and Recommendation finding that Plaintiff's Complaint asserted claims based on sovereign citizen ideology and principles, and as such, his claims were inherently frivolous and subject to summary dismissal. (ECF No. 6). Plaintiff filed his 173-page (plus exhibits) Objection to the Report and Recommendation on November 24, 2025. (ECF No. 7). On December 1, 2025, the Court entered its Order adopting the Report and Recommendation in full, denying Plaintiff's application to proceed in forma pauperis, and dismissing Plaintiff's Complaint without prejudice. (ECF No. 8). On December 3, 2025, Plaintiff moved to reopen his case (ECF No. 9), and the motion to reopen was denied on the same date. (ECF No. 11). Plaintiff then filed his Notice of Appeal on December 15, 2025, along with his Application to Proceed In Forma Pauperis on appeal. (ECF Nos. 13, 14). For the reasons and upon the authorities discussed in the screening Report and Recommendation, and after de novo consideration of Plaintiff's objections to the Report and Recommendation, Plaintiff's Complaint was dismissed without prejudice as frivolous. Plaintiff now states that his

appeal is taken in good faith and is not frivolous, seeking to challenge whether this Court: (a) erred in characterizing Plaintiff's filings as "sovereign citizen ideology" and dismissing his action as frivolous without addressing his specific constitutional and statutory claims; (b) erred in failing to conduct a de novo review of his detailed objections to the Report and Recommendation; (c) abused its discretion by dismissing the case without analyzing his individual causes of action, and without granting leave to amend; and (d) erred in the handling and classification of certain filings. Plaintiffs' Notice of Appeal and Application to Proceed In Forma Pauperis on appeal adds nothing new to the legal analysis. He has not cited any legal authority pertinent to § 1983 actions to support his allegations. Vague and conclusory allegations are frivolous on their face and leave to proceed in forma pauperis has been properly denied in such circumstances. See, e.g., *Green v. White*, 616 F.2d 1054, 1055 (8th Cir. 1980); *Meadows v. Gibson*, 855 F.Supp. 223 (W.D.Tenn. 1994) (frivolousness of complaint precluded appeal in forma pauperis); *Price v. McFarland*, 133 Fed.Appx. 485 (10th Cir. 2005) (unpublished) (denial of leave to proceed on appeal in forma pauperis where plaintiffs made sweeping generalizations to describe their claims and they failed to set forth any specific, non-conclusory arguments explaining why the district court's rulings were erroneous). Accordingly, it is RECOMMENDED that Plaintiffs' Application to Proceed In Forma Pauperis on Appeal (ECF No. 14) be DENIED. The parties have fourteen (14) days from receipt of the Report and Recommendation in which to file written objections pursuant to 28 U.S.C. § 636(b) (1). The failure to file timely objections may result in waiver of the right to appeal questions of fact. The parties are reminded that objections must be both timely and specific to trigger de novo review by the district court. DATED this 30th day of December 2025. /s/ Mark E. Ford

HON. MARK E. FORD

UNITED STATES MAGISTRATE JUDGE