

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

Ronald Satish Emrit v. Governor Wes Moore; Aisha Braveboy; Jamie
Raskin; Angela Alsobrooks; Chris Van Hollen; and Anthony Brown

Emrit v. Moore · No. 3:25-CV-03014-ECS · Decided May 15, 2026

SUMMARY

The United States District Court for the District of South Dakota granted Ronald Satish Emrit leave to proceed in forma pauperis and screened his pro se complaint under 28 U.S.C. § 1915(e)(2). The court dismissed the complaint with prejudice as frivolous and for failure to state a claim, concluding that venue was improper and that the action duplicated substantially similar suits filed in other jurisdictions. The court denied Emrit’s 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	Eric C. Schulte
JURISDICTION	United States District Court for the District of South Dakota, Central Division
DECIDED	May 15, 2026
DOCKET	3:25-CV-03014-ECS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff moved to proceed in forma pauperis. The district court granted that motion, screened the complaint under 28 U.S.C. § 1915(e)(2), and dismissed the complaint with prejudice as frivolous, duplicative, filed in an improper venue, and failing to state a claim.
STANDARD OF REVIEW	On screening under 28 U.S.C. § 1915(e)(2), the court accepted well-pleaded factual allegations as true, liberally construed the pro se complaint, and determined whether the claims were frivolous, failed to state a claim, or sought relief barred by immunity.
PRECEDENTIAL VALUE	unpublished

TOPICS

civil procedure

motions to dismiss

venue

civil rights

ada / disability

PRACTICE AREAS

civil procedure

civil rights

in forma pauperis screening

venue

disability discrimination

QUESTIONS PRESENTED

1. Whether the plaintiff should be permitted to proceed in forma pauperis despite his history of repetitive and abusive litigation.
2. Whether the complaint should be dismissed on screening under 28 U.S.C. § 1915(e)(2) as frivolous or for failure to state a claim.
3. Whether venue was proper in the District of South Dakota under 28 U.S.C. § 1391(b).
4. Whether the complaint could be dismissed as duplicative of parallel federal actions.

HOLDINGS

1. The court granted the plaintiff's initial motion to proceed in forma pauperis because the related filing-restriction proceeding remained unresolved, while recognizing that courts may deny in forma pauperis status to litigants who have abused the judicial system.
2. The complaint was dismissed with prejudice as frivolous and for failure to state a claim on which relief could be granted.
3. Venue was improper in the District of South Dakota because no defendant resided there and no alleged event or omission giving rise to the claims occurred there.
4. A federal complaint may be dismissed when it duplicates parallel federal litigation involving the same parties and controversy.

KEY QUOTATIONS

"Courts have "a duty to deny in forma pauperis status to those individuals who have abused the system.""

"Plaintiffs may not pursue multiple federal suits against the same party involving the same controversy at the same time."

FACTUAL BACKGROUND

Emrit, alleging that he was indigent, disabled, and unemployed and resided in Florida and Maryland, sued Maryland officials over the alleged failure to provide Section 8 housing, adequate EBT/SNAP benefits, and employment assistance. He asserted negligence, intentional infliction of emotional distress, tortious interference, civil-rights and constitutional claims, and claims purportedly based on the Fair Housing Act and Americans with Disabilities Act. He sought \$250,000 from each defendant and injunctions requiring housing, benefits, and employment assistance. The court found that none of the defendants resided in South Dakota and that no alleged events or omissions occurred there; it also found the action duplicative of substantially similar suits filed elsewhere.

PROCEDURAL HISTORY

Emrit filed a pro se complaint seeking damages and injunctive relief against Maryland officials and separately moved to proceed in forma pauperis. The court granted in forma pauperis status because the motion was pending while a related show-cause proceeding concerning filing restrictions had not concluded, then screened the complaint. The court dismissed the complaint with prejudice under 28 U.S.C. § 1915(e)(2)(B)(i) and (ii), and denied a second in forma pauperis motion as moot.

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., No. 25-CV-721-DWD, 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, at *1 (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)
- 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)
- Estate 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 (2007)
- Beavers v. Lockhart, 755 F.2d 657, 663 (8th Cir. 1985)
- Abdullah v. Minnesota, 261 F. App'x 926, 927 (8th Cir. 2008) (per curiam)

- Braden v. Wal-Mart Stores, Inc., 588 F.3d 585, 594 (8th Cir. 2009)
- 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)

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