

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Dickerson v. Johnson

Dickerson v. Johnson · No. 25-4405 (UNA) · Decided April 17, 2026

SUMMARY

The United States District Court for the District of Columbia grants the pro se plaintiff's motion to proceed in forma pauperis. The court dismisses the complaint without prejudice for lack of subject-matter jurisdiction, finding its allegations patently insubstantial.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amir H. Ali
JURISDICTION	United States District Court for the District of Columbia
DECIDED	April 17, 2026
DOCKET	25-4405 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff, proceeding pro se, filed a complaint against the Speaker of the U.S. House of Representatives and numerous state and federal judges and justices, and moved to proceed in forma pauperis. The district court granted in forma pauperis status and sua sponte dismissed the complaint without prejudice for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	The court considered subject-matter jurisdiction sua sponte under Federal Rule of Civil Procedure 12(h)(3) and 28 U.S.C. § 1915(e)(2)(B)(i).
PRECEDENTIAL VALUE	Published

TOPICS

- subject matter jurisdiction
- civil procedure
- pleadings

PRACTICE AREAS

- civil procedure
- federal jurisdiction

QUESTIONS PRESENTED

1. Whether the district court could dismiss the complaint sua sponte for lack of subject-matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3) and 28 U.S.C. § 1915(e)(2)(B)(i).
2. Whether allegations that were patently insubstantial and absolutely devoid of merit deprived the court of subject-matter jurisdiction.

HOLDINGS

1. A court may dismiss a complaint sua sponte for lack of subject-matter jurisdiction.
2. When a complaint is patently insubstantial and presents no federal question suitable for decision, the court lacks subject-matter jurisdiction; the complaint at issue met that standard.

KEY QUOTATIONS

“When a complaint is “‘patently insubstantial,’ presenting no federal question suitable for decision,” the court lacks authority to hear the case and dismissal is warranted.” (at 1)

“That standard includes cases that are “so attenuated and unsubstantial as to be absolutely devoid of merit.”” (at 1)

FACTUAL BACKGROUND

Plaintiff alleged that Speaker Mike Johnson and approximately 130 state and federal judges and justices participated in a criminal enterprise involving child trafficking and abuse. The complaint asserted that the defendants engaged in judicial kidnapping, racketeering, trafficking, genocide, cannibalism, and misuse of federal funding through guardianship and custody proceedings. The court concluded that these allegations were patently insubstantial and therefore did not present a federal question suitable for adjudication.

PROCEDURAL HISTORY

Dickerson filed the complaint and a motion for leave to proceed in forma pauperis. The district court granted the in forma pauperis motion, determined that the complaint's allegations were patently insubstantial, and dismissed the action without prejudice for lack of subject-matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Fed. R. Civ. P. 12(h)(3)
- 28 U.S.C. § 1915(e)(2)(B)(i)
- Best v. Kelly, 39 F.3d 328, 330 (D.C. Cir. 1994)
- Neitzke v. Williams, 490 U.S. 319, 327 n.6 (1989)
- Hagans v. Lavine, 415 U.S. 528, 536-37 (1974)

- Newburyport Water Co. v. Newburyport, 193 U.S. 561, 579 (1904)
- Tooley v. Napolitano, 586 F.3d 1006, 1010 (D.C. Cir. 2009)

OPINION

Dickerson v. Johnson

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

MICHELLE MARRYANN DICKERSON,

Plaintiff, v. Civil Action No. 25-4405 (UNA) MIKE JOHNSON, et al., Defendants. Memorandum Opinion Plaintiff, proceeding pro se, brings this action against Speaker of the U.S. House of Representatives Mike Johnson and 130 state and federal judges and justices, alleging they are engaged in a criminal enterprise that traffics and abuses children. ECF No. 1. She has also filed a motion for leave to proceed in forma pauperis. ECF No. 2. For the reasons below, the court grants the motion to proceed in forma pauperis and dismisses the complaint without prejudice for lack of subject-matter jurisdiction. A court may dismiss a complaint sua sponte for lack of subject-matter jurisdiction. See Fed. R. Civ. P. 12(h)(3); see also 28 U.S.C. § 1915(e)(2)(B)(i). When a complaint is “‘patently insubstantial,’ presenting no federal question suitable for decision,” the court lacks authority to hear the case and dismissal is warranted. *Best v. Kelly*, 39 F.3d 328, 330 (D.C. Cir. 1994) (quoting *Neitzke v. Williams*, 490 U.S. 319, 327 n.6 (1989)). That standard includes cases that are “so attenuated and unsubstantial as to be absolutely devoid of merit.” *Hagans v. Lavine*, 415 U.S. 528, 536–37 (1974) (quoting *Newburyport Water Co. v. Newburyport*, 193 U.S. 561, 579 (1904)); see also *Tooley v. Napolitano*, 586 F.3d 1006, 1010 (D.C. Cir. 2009) (collecting cases dismissed “for patent insubstantiality,” including where the plaintiff allegedly “was subjected to a campaign of surveillance and harassment deriving from uncertain origins”). Here, the complaint’s allegations are patently insubstantial and deprive the court of jurisdiction to hear the case. For example, the complaint alleges that Chief Justice John Roberts “[e]nrich[es] himself through the commodification of children” by participating in “judicial kidnapping” and a “conspiracy to maintain a racketeering enterprise.” ECF No. 1 at 39. It further alleges that Defendants’ “enterprise . . . orchestrat[es] mass trafficking that constitutes a genocide of children on a global scale.” *Id.* at 44. According to the complaint, this “Judicial Racket Enterprise” has “systematically weaponized Title IV funding, guardianship proceedings, and custody litigation to traffic children, launder federal funds, and silence dissent.” *Id.* at 53. The complaint alleges that “[b]eyond trafficking, the enterprise perpetuated acts of cannibalism and other grotesque abuses shielded by the absence of explicit federal prohibition on cannibalism and further protected by wealth, secrecy, and corrupt judicial mechanisms.” *Id.* at 46. These allegations are similar to those that courts have routinely dismissed for “patent insubstantiality.” *Tooley*, 586 F.3d at 1010 (collecting cases). For these reasons, the court grants the motion to proceed in forma pauperis, ECF No. 2, and dismisses the

complaint without prejudice for lack of subject-matter jurisdiction. A separate order accompanies this memorandum opinion. /s/

AMIR H. ALI

United States District Judge Date: April 16, 2026 2