

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)

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