

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Carrington v. Trump

Carrington · No. Civil Action No. 25-3575 (UNA) · Decided November 25, 2025

SUMMARY

The United States District Court for the District of Columbia granted the plaintiff's application to proceed in forma pauperis but dismissed the complaint without prejudice for lack of subject matter jurisdiction. The court held that the plaintiff failed to allege an injury sufficient to establish Article III standing and explained that his request for release from custody had to be pursued in a habeas action against the proper custodian in the appropriate jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Trevor N. McFadden
JURISDICTION	United States District Court for the District of Columbia
DECIDED	November 25, 2025
DOCKET	Civil Action No. 25-3575 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court considered plaintiff's application to proceed in forma pauperis and his pro se complaint.
STANDARD OF REVIEW	The court applied the Article III standing requirements and independently assessed its subject matter jurisdiction.
PRECEDENTIAL VALUE	published district court memorandum opinion
PARTIES	Theodore Macon Carrington, Jr. v. Donald J. Trump, Attorney General of the United States, United States Department of Justice, Federal Elections Commission

TOPICS

- standing
- subject matter jurisdiction
- federal habeas corpus
- civil procedure

PRACTICE AREAS

- civil procedure
- constitutional law
- federal habeas corpus
- election law

QUESTIONS PRESENTED

1. Whether plaintiff alleged facts sufficient to establish Article III standing and subject matter jurisdiction.
2. Whether the district court was the proper forum for plaintiff's request for release from custody under habeas corpus.

HOLDINGS

1. Plaintiff failed to allege facts establishing that he suffered or was likely to suffer an injury resulting from any defendant's conduct; therefore, he lacked Article III standing and the court lacked subject matter jurisdiction.
2. The district court could not entertain plaintiff's request for release from custody because a habeas petition challenging present physical custody must name the custodian as respondent, and the custodian must be within the court's territorial jurisdiction.

KEY QUOTATIONS

"Article III of the United States Constitution limits the judicial power to deciding 'Cases and Controversies.'" (at 1)

"A party has standing for purposes of Article III if he has "(1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision.'" (at 1)

"Because plaintiff fails to allege facts sufficient to establish standing, the Court lacks subject matter jurisdiction." (at 2)

FACTUAL BACKGROUND

Plaintiff was a civilly committed detainee at the Federal Medical Center in Butner, North Carolina. He alleged that the President had orchestrated an illegal power grab involving United States elections and sought criminal charges, \$75 billion in damages from multiple defendants, and release from custody. The complaint did not allege a concrete injury caused or likely to be caused by any defendant.

PROCEDURAL HISTORY

Plaintiff filed a pro se complaint seeking damages, criminal charges against the President, and release from custody. The district court granted the application to proceed in forma pauperis but dismissed the complaint without prejudice for lack of subject matter jurisdiction because plaintiff failed to establish Article III standing. The court also determined that any habeas claim seeking release was brought in the wrong forum because plaintiff's custodian was not within the district's territorial jurisdiction.

DISPOSITION

dismissed

CASES CITED

- In re Navy Chaplaincy, 534 F.3d 756, 759 (D.C. Cir. 2008)
- Comm. on Judiciary of U.S. House of Representatives v. McGahn, 968 F.3d 755, 762-63 (D.C. Cir. 2020) (en banc)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 560, 573-74 (1992)
- Rumsfeld v. Padilla, 542 U.S. 426, 434-35 (2004)
- Stokes v. U.S. Parole Comm'n, 374 F.3d 1235, 1239 (D.C. Cir. 2004)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA THEODORE MACON CARRINGTON, JR.,)) Plaintiff,)) v.) Civil Action No. 25-3575 (UNA)) DONALD J. TRUMP, et al.,)) Defendants.) MEMORANDUM OPINION This matter is before the Court on plaintiff's application to proceed in forma pauperis and his pro se complaint.

The application will be granted, and the complaint will be dismissed without prejudice for lack of subject matter jurisdiction. "Article III of the United States Constitution limits the judicial power to deciding 'Cases and Controversies.'" In re Navy Chaplaincy, 534 F.3d 756, 759 (D.C. Cir. 2008) (quoting U.S. Const. art. III, § 2). "One element of the case-or-controversy requirement is that plaintiffs must establish that they have standing to sue." Comm. on Judiciary of U.S. House of Representatives v. McGahn, 968 F.3d 755, 762 (D.C.

Cir. 2020) (en banc) (cleaned up). A party has standing for purposes of Article III if he has "(1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision." Id. at 763 (quoting Lujan v. Defenders of Wildlife, 504 U.S. 555, 560 (1992)). Plaintiff, a civilly committed detainee at the Federal Medical Center in Butner, North Carolina, alleges that the current President of the United States "has orchestrated the biggest, illegal power grab in the History of U.S. Elections[.]" Compl. at 6 (page numbers designated by CM/ECF).

He demands that the President "face criminal charges for his actions, and pay [plaintiff] \$75 billion dollars." Id. at 11. Further, he demands payment of \$75 billion from the 1 Attorney General of the United States, the United States Department of Justice, and the Federal Elections Commission," id., and his release from prison, see id. Missing from the complaint are any factual allegations establishing that plaintiff sustained (or is likely to sustain) an injury resulting from any defendant's action. "[A] plaintiff raising only a generally available grievance about government—claiming only harm to his and every citizen's interest in proper application of the Constitution and laws, and seeking relief that no more directly and tangibly benefits him than it does the public at large—does not state an Article III case or controversy." Lujan, 504 U.S. at 573-74.

Because plaintiff fails to allege facts sufficient to establish standing, the Court lacks subject matter jurisdiction. Insofar as plaintiff demands release from custody, this Court is not the proper forum for adjudication of this habeas claim.

The proper respondent in a habeas corpus action is plaintiff's custodian, see *Rumsfeld v. Padilla*, 542 U.S. 426, 434-35 (2004), and this "district court may not entertain a habeas petition involving present physical custody unless the respondent custodian is within its territorial jurisdiction," *Stokes v. U.S. Parole Comm'n*, 374 F.3d 1235, 1239 (D.C. Cir. 2004).

An Order is issued separately. TREVOR N. McFADDEN Date: November 24, 2025 United States District Judge 2