

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)

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