

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Patrick Farrell v. Donald Trump, et al.

No. CV-26-02392-PHX-MTL (D. Ariz. Apr. 23, 2026) · No. No. CV-26-02392-PHX-MTL · Decided April 23, 2026

SUMMARY

The United States District Court for the District of Arizona dismissed Patrick Farrell’s complaint against Donald Trump and Scott Bessent for lack of subject-matter jurisdiction. The court characterized the complaint as patently insubstantial and frivolous, including sovereign-citizen theories concerning birth-certificate bonds, and denied the motion to amend as moot.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Michael T. Liburdi
JURISDICTION	United States District Court for the District of Arizona
DECIDED	April 23, 2026
DOCKET	No. CV-26-02392-PHX-MTL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a sealed complaint against the President of the United States and the Secretary of the Treasury. The district court sua sponte dismissed the complaint for lack of subject-matter jurisdiction and denied the pending motion to amend as moot.
STANDARD OF REVIEW	The court independently assessed subject-matter jurisdiction and whether the complaint was patently insubstantial and frivolous.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation

TOPICS

- subject matter jurisdiction
- motions to dismiss
- civil procedure
- federal spending
- constitutional law

PRACTICE AREAS

- Federal civil procedure
- Federal jurisdiction
- Constitutional law

QUESTIONS PRESENTED

1. Whether the complaint was so patently insubstantial and frivolous that it could not support federal subject-matter jurisdiction.
2. Whether the motion to amend should be decided after dismissal of the complaint for lack of subject-matter jurisdiction.

HOLDINGS

1. A complaint that is patently insubstantial and frivolous cannot support federal subject-matter jurisdiction and may be dismissed sua sponte under Federal Rule of Civil Procedure 12(b)(1). Farrell's complaint was sufficiently insubstantial and frivolous to require dismissal for lack of subject-matter jurisdiction.
2. The motion to amend the complaint was denied as moot after the complaint was dismissed for lack of subject-matter jurisdiction.

KEY QUOTATIONS

“A patently insubstantial complaint may be dismissed . . . for want of subject-matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1).” (2)

“A federal claim which is so insubstantial as to be patently without merit cannot serve as the basis for federal jurisdiction.” (2)

“IT IS THEREFORE ORDERED that the complaint is dismissed for lack of subject matter jurisdiction.” (3)

FACTUAL BACKGROUND

Farrell alleged that the presidential administration was spending taxpayer funds that he believed belonged to him as interest on a supposed birth-certificate bond. He characterized himself as a sovereign citizen and asserted that the government's conduct harmed his spiritual karma and involved biblical and moral violations. His complaint and proposed amended complaint included sovereign-citizen and redemptionist theories concerning birth certificates, the Treasury, and government financing.

PROCEDURAL HISTORY

Patrick Farrell filed a complaint asserting that the federal government was improperly spending funds allegedly associated with a birth-certificate bond belonging to him. The court unsealed the complaint, determined that its claims were patently insubstantial and frivolous, dismissed the action sua sponte for lack of subject-matter jurisdiction, denied the motion to amend as moot, and directed the Clerk to enter judgment and close the case.

DISPOSITION

dismissed

CASES CITED

- Patterson v. Yellen, No. 6:23-cv-01177-MC, 2023 WL 8477411, at *1 (D. Or. Dec. 7, 2023)
- United States v. Cook, No. 3:18-CR-00019, 2019 WL 2721305, at *2 (E.D. Tenn. June 28, 2019)

- Bryant v. Wash. Mut. Bank, 524 F. Supp. 2d 753, 758-59 (W.D. Va. 2007)
- Neitzke v. Williams, 490 U.S. 319, 327 n.6 (1989)
- Trust v. Am. Honda Fin. Corp., No. 2:16-cv-1237-ODW-SS, 2016 WL 756461, at *2 (C.D. Cal. Feb. 25, 2016)
- Patterson v. Yellen, 2023 WL 8477411, at *2 (D. Or. Dec. 7, 2023)

OPINION

Farrell

PER CURIAM.

1 WO 2 3 4 5

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF ARIZONA

8 9 Patrick Farrell, No. CV-26-02392-PHX-MTL 10 Plaintiff, ORDER 11 v. 12 Donald Trump, et al., 13 Defendants. 14 15 Plaintiff Patrick Farrell filed a sealed complaint against President Donald Trump 16 and Secretary of the Treasury Scott Bessent. (Doc. 1.) The Court has since unsealed the 17 complaint. Broadly, the complaint is sprawling, largely incomprehensible, and filled with 18 derogatory statements. (See, e.g., id. at 14 (“Trump serves the Synagogue of Satan that 19 includes Israel, because they are stupid.”); id. at 28 (“All issues in this complaint come 20 from Jew Treasury funding, former Jews in ISKCON, former Jews in the mortgage 21 crisis”); id. at 32 (“This is why people of the world hate the Jews, because the Jews in 22 the Old Testament think they are better than all else and can take other’s lives without 23 ‘remorse.’ Or sexually molest children in their care”); id. at 37 (accusing “[t]he Jews” 24 of, among other things, assassinating John F. Kennedy and orchestrating and profiting from 25 9/11).) 26 From what the Court can understand, Plaintiff appears to be unhappy with how the 27 current presidential administration is spending taxpayer funds that Plaintiff alleges 28 rightfully belong to him as interest on his birth certificate bond that was supposedly created 1 when he was born and his birth certificate was “registered.” (See, e.g., id. at 7 (claiming 2 that Plaintiff is entitled to interest on “birth certificate bonds”); id. at 9-10 (similar); id. at 3 13 (same).) These appear to be sovereign citizen arguments,* which is consistent with 4 Plaintiff’s allegations indicating he believes himself to be a sovereign citizen. (See id. at 7 5 (calling himself a “Sovereign American”); id. at 13 (“I filed all Sovereignty Documentation 6 into the US Treasury and IRS and State and Federal Courts”); id. at 45 (“.09% of 7 people are Sovereigns like me.”).) Plaintiff alleges he is being tortured by the 8 administration’s actions because such actions have “compromised [his] good Spiritual 9 Karma that [he has] built up over [his] lifetime,” and by using the money he believes 10 belongs to him, the administration is making him a party to “illegal and sinful behavior.” 11 (Id. at 15; see also id. at 21; id. at 37 (“Trump has murdered thousands and Bessent has 12 given Trump the funds to do it from my account.”); id. at 41.) He also sets out sins and 13 biblical violations he believes the administration has committed. (See, e.g., id. at 37-41.) 14 Plaintiff’s

motion to amend his complaint contains similar types of allegations. 15 (Doc. 6 at 1-2 (“Americans are debtors after the birth certificate was put into the Dept. of 16 Commerce and they must fund the debts of the U.S. except me, a Sovereign. The birth 17 certificate registration is not a valid contract and are not the surety for all unlawful debts 18 the corrupt Trump administration imposes on Americans.”); id. at 3 (advertising Plaintiff’s 19 book, which he alleges describes how people can “reclaim[] their birth certificates from 20 defendant US Treasury”); id. (stating that the government is funded by a financing 21 statement that “comes from the resources in GOD’s earth and life force in 300 million 22 citizens”); id. at 8 (“I no longer believe the United States of America exists, since the 23 parasitical fake Jews have taken over the US Treasury, the IRS, the Federal Reserve, the 24 Media and Wall Street, that are owned and operated by Jews who were blinded and cursed 25 * See, e.g., *Patterson v. Yellen*, No. 6:23-cv-01177-MC, 2023 WL 8477411, at *1 (D. Or.

26 Dec. 7, 2023) (“Many sovereign citizens subscribe to the ‘redemptionist’ theory and claim they are owed money based on the issuance of their birth certificates.”); *United States v. 27 Cook*, No. 3:18-CR-00019, 2019 WL 2721305, at *2 (E.D. Tenn. June 28, 2019) (“[S]overeigns believe they can use the court systems to access funds tied to their birth 28 certificate and Social Security numbers, through a tactic known as ‘redemption.’”); *Bryant v. Wash. Mut. Bank*, 524 F. Supp. 2d 753, 758-59 (W.D. Va. 2007). byGOD....”).) 2 “A patently insubstantial complaint may be dismissed . . . for want of subject-matter 3 || jurisdiction under Federal Rule of Civil Procedure 12(b)(1).” *Neitzke v. Williams*, 490 U.S. 319, 327 n.6 (1989). “A federal claim which is so insubstantial as to be patently without 5 || merit cannot serve as the basis for federal jurisdiction.” *Trust v. Am. Honda Fin. Corp.*, 6|| No. 2:16-cv-1237-ODW-SS, 2016 WL 756461, at *2 (C.D. Cal. Feb. 25, 2016). 7|| Additionally, “claims based on sovereign citizen arguments and ideology” are routinely 8 || rejected as frivolous. See *Patterson*, 2023 WL 8477411, at *2 (dismissing frivolous 9|| complaint for lack of subject matter jurisdiction). Having reviewed the complaint, the || Court finds that it is so substantial and frivolous that sua sponte dismissal for lack of 11 || subject matter jurisdiction 1s appropriate. 12 IT IS THEREFORE ORDERED that the complaint is dismissed for lack of 13} subject matter jurisdiction. The Clerk of Court is directed to enter judgment accordingly 14|| and close this case. 15 IT IS FURTHER ORDERED that the Motion to Amend Complaint (Doc. 6) is 16||} denied as moot. 17 Dated this 23rd day of April, 2026. 18 20 Michael T, Liburdi 21 United States District Judge 22 23 24 25 26 27 28 _3-