

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)

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