

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

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-