

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Shallow v. United States

Shallow · No. Civil Action No. 1:26-cv-01786 (UNA) · Decided June 16, 2026

SUMMARY

The United States District Court for the District of Columbia grants the plaintiff’s application to proceed in forma pauperis but dismisses the complaint without prejudice as frivolous under 28 U.S.C. § 1915(e)(2)(B)(i). The court concludes that the allegations are irrational and lack an arguable basis in law or fact, depriving the court of subject matter jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Tanya S. Chutkan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 16, 2026
DOCKET	Civil Action No. 1:26-cv-01786 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court considered Plaintiff's Complaint and application for leave to proceed in forma pauperis at the screening stage.
STANDARD OF REVIEW	At the IFP screening stage, the court assessed whether the complaint stated a plausible claim, whether it had an arguable basis in law or fact, and whether the allegations were irrational or wholly incredible.
PRECEDENTIAL VALUE	Published district court memorandum opinion; persuasive authority within the District of Columbia and nonbinding elsewhere.

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure

PRACTICE AREAS

- civil procedure
- constitutional law

QUESTIONS PRESENTED

1. Whether the complaint should be dismissed as frivolous because its allegations lacked an arguable basis in law or fact and were irrational or wholly incredible.
2. Whether the court could exercise subject matter jurisdiction over a frivolous complaint under the IFP screening statute.

HOLDINGS

1. The complaint was frivolous because its allegations were irrational, wholly incredible, and lacked an arguable basis in law or fact.
2. A federal court cannot exercise subject matter jurisdiction over a complaint that is frivolous and absolutely devoid of merit.
3. The complaint was dismissed without prejudice under 28 U.S.C. § 1915(e)(2)(B)(i).

KEY QUOTATIONS

“The instant Complaint falls squarely into this category.”

“Accordingly, this matter is dismissed without prejudice.”

FACTUAL BACKGROUND

Plaintiff alleged that he was a DEA Group Leader and Chief of the United Nations and described purported conspiracies involving his mother, the federal government, and others. He alleged that these conspiracies were intended to murder, impersonate, attack, and falsely arrest him, steal his property, usurp him, and commit other wrongdoing. The court found the allegations difficult to understand and characterized them as irrational and wholly incredible.

PROCEDURAL HISTORY

Plaintiff filed a complaint against the United States and an application to proceed in forma pauperis. The court granted the IFP application but dismissed the complaint without prejudice under 28 U.S.C. § 1915(e)(2)(B)(i).

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Hagans v. Lavine, 415 U.S. 528, 536–37 (1974)
- Newburyport Water Co. v. Newburyport, 193 U.S. 561, 579 (1904)
- Tooley v. Napolitano, 586 F.3d 1006, 1010 (D.C. Cir. 2009)
- Denton v. Hernandez, 504 U.S. 25, 33 (1992)

- *Crisafi v. Holland*, 655 F.2d 1305, 1307–08 (D.C. Cir. 1981)

OPINION

Shallow v. United States

PER CURIAM.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SEAN SHALLOW,)

) Plaintiff,)) Civil Action No. 1:26-cv-01786 (UNA) v.)))

UNITED STATES OF AMERICA,)

)) Defendant.)

MEMORANDUM OPINION

This matter is currently before the Court on consideration of Plaintiff’s Complaint, ECF No. 1, and Application for Leave to Proceed in forma pauperis (“IFP”), ECF No. 2. Upon review, the Court grants Plaintiff’s IFP Application, and for the reasons explained below, it dismisses this matter without prejudice. Plaintiff, who purports to be a “DEA Group Leader” and Chief of the United Nations, sues the United States. The allegations are difficult to understand, presented in run-on paragraphs with stream-of-consciousness styled anecdotes, spanning decades, presented as evidence of multiple conspiracies orchestrated against him by his mother, the federal government, and others, with the intent to, inter alia, murder him, impersonate him, attack him, steal his property, falsely arrest him, “usurp” him, and engage in other “wicked evil things.” Applicable here, a “complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face,’” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007)), and a complaint that lacks “an arguable basis either in law or in fact” is frivolous. *Neitzke v. Williams*, 490 U.S. 319, 325 (1989). Moreover, a federal court cannot exercise subject matter jurisdiction over a frivolous complaint. *Hagans v. Lavine*, 415 U.S. 528, 536–37 (1974) (“Over the years this Court has repeatedly held that the federal courts are without power to entertain claims otherwise within their jurisdiction if they are ‘so attenuated and unsubstantial as to be absolutely devoid of merit.’”) (quoting *Newburyport Water Co. v. Newburyport*, 193 U.S. 561, 579 (1904)); *Tooley v. Napolitano*, 586 F.3d 1006, 1010 (D.C. Cir. 2009) (examining cases dismissed “for patent insubstantiality,” including where the plaintiff allegedly “was subjected to a campaign of surveillance and harassment deriving from uncertain origins”). A court may dismiss a complaint as frivolous “when the facts alleged rise to the level of the irrational or the wholly incredible,” *Denton v. Hernandez*, 504 U.S. 25, 33 (1992), or “postulat[e] events and circumstances of a wholly fanciful kind,” *Crisafi v. Holland*, 655 F.2d 1305, 1307–08 (D.C. Cir. 1981). The instant Complaint falls squarely into this category. Accordingly, this matter is dismissed without prejudice. See 28 U.S.C. § 1915(e)(2)(B)(i). A separate Order accompanies this Memorandum Opinion. Date: June 16, 2026 Tanya S. Chutkan

TANYA S. CHUTKAN
United States District Judge

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-district-of-columbia-united-states-district-court-for-the-distr/2026/shallow-v-united-states-rv80qsw0>