

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Simmons v. United States Government

Civil Action No. 25-0851 (JMC) (D.D.C. Feb. 26, 2026) · No. Civil Action No. 25-cv-851 (JMC) · Decided February 26, 2026

SUMMARY

The United States District Court for the District of Columbia dismisses pro se plaintiff Robert C. Simmons’s claims against the United States, government entities, and financial institutions for lack of Article III standing. The court concludes that the complaint asserts generalized grievances rather than concrete and particularized injuries and therefore does not establish subject-matter jurisdiction. The action is dismissed with prejudice, and the plaintiff’s supplemental motion for a writ of mandamus and notice of constitutional challenge is denied as moot.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 26, 2026
DOCKET	Civil Action No. 25-cv-851 (JMC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se complaint asserting constitutional, statutory, tort, contract, and other claims against the federal government, District government entities, banks, and financial institutions. Appearing defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(1), and the court independently dismissed the action as to all defendants for lack of standing and subject matter jurisdiction.
STANDARD OF REVIEW	The court reviewed subject-matter jurisdiction and standing under Federal Rule of Civil Procedure 12(b)(1), accepting the jurisdictional allegations for purposes of the motion but determining that the complaint failed to establish Article III standing. The court also considered whether amendment could cure the pleading deficiency.
PRECEDENTIAL VALUE	published
PARTIES	Robert C. Simmons v. United States Government, U.S. House of Representatives, U.S. Senate, Supreme Court of the United States,

U.S. Department of Justice, U.S. Department of Treasury, D.C. Office of the Attorney General, Board of Governors of the Federal Reserve, Federal National Mortgage Association, Federal Home Loan Mortgage Corporation, Bank of America Corporation, Bank of America, N.A., Citigroup Inc., Citibank, N.A., Citimortgage, Inc., J.P. Morgan Chase & Company, J.P. Morgan Chase Bank, N.A., Wells Fargo & Company, Wells Fargo Bank, N.A., American International Group, Inc.

TOPICS

standing

subject matter jurisdiction

motions to dismiss

pleadings

civil procedure

PRACTICE AREAS

civil procedure

constitutional law

federal jurisdiction

QUESTIONS PRESENTED

1. Whether plaintiff established Article III standing by alleging a concrete and particularized injury caused by defendants and redressable by judicial relief.
2. Whether the court possessed subject matter jurisdiction over plaintiff's generalized grievances.
3. Whether plaintiff should be permitted to amend his complaint or whether dismissal with prejudice was warranted.
4. Whether plaintiff's supplemental motion for a writ of mandamus and notice of constitutional challenge should be denied as moot.

HOLDINGS

1. Plaintiff lacked Article III standing because his complaint asserted generalized grievances and did not allege a concrete, particularized, personal injury caused by defendants.
2. Because plaintiff lacked Article III standing, the court lacked subject matter jurisdiction and dismissed the action against all defendants, including defendants that had not appeared or had not raised standing.
3. Dismissal with prejudice was warranted because plaintiff expressly based the action on generalized public grievances and could not add facts consistent with the complaint that would transform those grievances into a personal injury.

KEY QUOTATIONS

“To establish standing, “a plaintiff must show (i) that he suffered an injury in fact that is concrete, particularized, and actual or imminent; (ii) that the injury was likely caused by the defendant; and (iii) that the injury would likely be redressed by judicial relief.”” (2)

“claiming only harm to his and every citizen’s interest in proper application of the Constitution and laws, and seeking relief that no more directly and tangibly benefits him than it does the public at large—do[] not state an Article III case or controversy.” (3)

“the allegation of other facts consistent with the challenged pleading could not possibly cure the deficiency”
(4)

FACTUAL BACKGROUND

Simmons alleged that federal and District governmental entities, banks, and other financial institutions engaged in systemic misconduct, including corporate waste, abuse of control, unjust enrichment, and failures affecting the U.S. economic system. He described himself as a taxpayer and shareholder in the United States and sought sweeping relief benefiting the public generally. He did not identify any specific transaction with, or particularized conduct by, any defendant that injured him personally.

PROCEDURAL HISTORY

Simmons filed a 178-page complaint characterizing his claims as a derivative action on behalf of the people of the United States. Several defendants moved to dismiss, arguing among other things that the complaint failed to allege a personal injury. The court held that the complaint asserted only generalized grievances, dismissed the case in its entirety with prejudice, and denied as moot plaintiff's supplemental motion for a writ of mandamus and notice of constitutional challenge.

DISPOSITION

dismissed

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Boston & Maine Corp. v. Surface Transportation Board, 364 F.3d 318, 319 (D.C. Cir. 2004)
- Committee on the Judiciary of the U.S. House of Representatives v. McGahn, 968 F.3d 755, 762 (D.C. Cir. 2020) (en banc)
- Clapper v. Amnesty International USA, 568 U.S. 398, 408 (2013)
- TransUnion LLC v. Ramirez, 594 U.S. 413, 423 (2021)
- FDA v. Alliance for Hippocratic Medicine, 602 U.S. 367, 381 (2024)
- Hollingsworth v. Perry, 570 U.S. 693, 706 (2013)
- Umude v. American Security Programs, Inc., 107 F. Supp. 3d 52, 55 (D.D.C. 2015)
- Firestone v. Firestone, 76 F.3d 1205, 1209 (D.C. Cir. 1996)
- Georgiades v. Martin-Trigona, 729 F.2d 831, 834 (D.C. Cir. 1984)
- Evans v. Suter, No. 09-5242, 2010 WL 1632902, at *1 (D.C. Cir. Apr. 2, 2010)