

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

M-EDIF, Members of EDIF; W. MJ Boyd, Founder also known as
Wanda Boyd v. Donald J. Trump, President; MAGA, Inc.; Federal
Government; Maurene Ryan Comey

M-EDIF · No. 2:26-1467-RMG-TER · Decided April 10, 2026

SUMMARY

This Report and Recommendation addresses a pro se, in forma pauperis civil action in which the plaintiff appeared to assert claims on behalf of Sean P. Diddy Combs and other persons or entities. The magistrate judge recommends dismissal with prejudice as frivolous and without issuance or service of process. It also recommends a narrowly tailored prefiling injunction requiring the plaintiff to sue only on her own behalf, pay the full filing fee, and submit an affidavit certifying that future actions are not frivolous.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Thomas E. Rogers, III
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	April 10, 2026
DOCKET	2:26-1467-RMG-TER
DISPOSITION	other
PROCEDURAL POSTURE	A pro se plaintiff proceeding in forma pauperis filed a civil complaint apparently attempting to assert claims on behalf of another person. A magistrate judge issued a Report and Recommendation recommending summary dismissal with prejudice and without issuance or service of process, together with prospective prefiling restrictions.
STANDARD OF REVIEW	Pro se complaints are liberally construed and held to a less stringent standard than pleadings drafted by attorneys, but a court may not rewrite a complaint, construct legal arguments for the plaintiff, or ignore a clear failure to allege facts supporting a cognizable federal claim. In reviewing an in forma pauperis complaint, the court may pierce the veil of the complaint's factual allegations and determine whether the action is frivolous. A prefiling restriction requires

	consideration of the litigant's litigation history, good-faith basis, burden on the courts and other parties, and adequacy of alternative sanctions, with any injunction narrowly tailored to the circumstances.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	M-EDIF, Members of EDIF, W. MJ Boyd, Founder also known as Wanda Boyd v. Donald J. Trump, President, MAGA, Inc., Federal Government, Maurene Ryan Comey

TOPICS

sanctions civil procedure pleadings section 1983 remedies

PRACTICE AREAS

civil procedure constitutional law civil rights remedies

QUESTIONS PRESENTED

1. Whether a pro se plaintiff may litigate claims on behalf of another person.
2. Whether the complaint was frivolous and subject to summary dismissal under the in forma pauperis screening process.
3. Whether the plaintiff's repeated frivolous filings justified a narrowly tailored prefiling injunction and restrictions on proceeding in forma pauperis.

HOLDINGS

1. A pro se litigant may litigate only her own claims and may not represent another person in federal court.
2. The complaint was frivolous and subject to summary dismissal because it failed to allege facts establishing a currently cognizable federal claim.
3. The plaintiff's repeated frivolous filings supported a recommendation for a narrowly tailored prefiling injunction requiring future filings to be brought in the plaintiff's own name, accompanied by the full filing fee, and supported by a sworn affidavit that the action is not frivolous.

KEY QUOTATIONS

"The right to litigate for oneself, however, does not create a coordinate right to litigate for others." (at 2)

"Prior to authorizing a limitation on filing, a court must weigh the following factors:" (at 3)

"In crafting a sanction, courts "must ensure that the injunction is narrowly tailored to fit the specific circumstances at issue."" (at 3)

"It is recommended that the District Court dismiss this action with prejudice and without issuance and service of process." (at 6)

FACTUAL BACKGROUND

The plaintiff filed a pro se complaint and an in forma pauperis motion, but the complaint appeared to seek relief for Sean P. Diddy Combs and was captioned as involving members of M-EDIF. Only the plaintiff signed the complaint and the in forma pauperis motion. The complaint alleged that Combs had been attacked by the government and President Trump at a courthouse in New York, but identified no injuries and did not clearly identify the constitutional right allegedly violated. The court also considered the plaintiff's several other recent filings, which had likewise been recommended for summary dismissal as frivolous.

PROCEDURAL HISTORY

The action was filed in the United States District Court for the District of South Carolina by a pro se litigant proceeding in forma pauperis. The magistrate judge reviewed the complaint under 28 U.S.C. § 636(b)(1) and Local Civil Rule 73.02(B)(2)(e), concluded that the allegations were frivolous and that the plaintiff could not represent another person, and recommended dismissal. The magistrate judge also recommended a narrowly tailored prefiling injunction because of the plaintiff's repeated frivolous filings, subject to the plaintiff's opportunity to file objections within fourteen days.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Gordon v. Leeke, 574 F.2d 1147, 1151 (4th Cir. 1978)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1278 (4th Cir. 1985)
- Small v. Endicott, 998 F.2d 411 (7th Cir. 1993)
- Barnett v. Hargett, 174 F.3d 1128 (10th Cir. 1999)
- Weller v. Dep't of Soc. Servs., 901 F.2d 387, 390-91 (4th Cir. 1990)
- Denton v. Hernandez, 504 U.S. 25, 32 (1992)
- Myers v. Loudoun Cty. Pub. Sch., 418 F.3d 395, 400 (4th Cir. 2005)
- Silvestri v. General Motors Corp., 271 F.3d 583, 590 (4th Cir. 2001)
- Cromer v. Kraft Foods N. Am. Inc., 390 F.3d 812, 818 (4th Cir. 2004)
- Safir v. United States Lines, Inc., 792 F.2d 19, 24 (2d Cir. 1986)
- Green v. Prince George's Cnty. Off. of Child Support, 641 B.R. 820, 843 (D. Md. 2022), aff'd, 2023 WL 3051812 (4th Cir. Apr. 24, 2023)
- Haggins v. Tarwater, 2013 WL 1319400, at *2 (W.D.N.C. Mar. 29, 2013)
- Doe v. Crouch, 2023 WL 2711632, at *7 (S.D.W. Va. Mar. 30, 2023), aff'd, 2023 WL 4839360 (4th Cir. July 28, 2023)
- Diamond v. Colonial Life & Acc. Ins. Co., 416 F.3d 310 (4th Cir. 2005)
- Thomas v. Arn, 474 U.S. 140 (1985)

- Wright v. Collins, 766 F.2d 841 (4th Cir. 1985)
- United States v. Schronce, 727 F.2d 91 (4th Cir. 1984)

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