

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Schiff v. Trump

Schiff · No. Civil Action No. 25-4571 (UNA) · Decided February 17, 2026

SUMMARY

The United States District Court for the District of Columbia granted Graham Schiff’s application to proceed in forma pauperis and dismissed his pro se complaint without prejudice for lack of subject-matter jurisdiction. The court held that Schiff failed to allege a concrete and particularized injury supporting Article III standing, including because he challenged executive actions concerning Greenland based on a generalized grievance.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Loren L. AliKhan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 17, 2026
DOCKET	Civil Action No. 25-4571 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The plaintiff filed a pro se complaint and an application to proceed in forma pauperis. Before service, the court considered whether the complaint established subject-matter jurisdiction and Article III standing.
STANDARD OF REVIEW	A federal district court may dismiss a complaint sua sponte before service under Federal Rule of Civil Procedure 12(h)(3) when it is evident that the court lacks subject-matter jurisdiction. Article III standing requires injury in fact, causation, and redressability.
PRECEDENTIAL VALUE	Published memorandum opinion; precedential status is identified as published in the supplied metadata.
PARTIES	Graham Schiff v. Donald Trump, Defendants

TOPICS

- subject matter jurisdiction
- standing
- civil procedure
- foreign affairs

PRACTICE AREAS

civil procedure

constitutional law

federal jurisdiction

QUESTIONS PRESENTED

1. Whether the plaintiff sufficiently alleged Article III standing to challenge asserted executive actions concerning Greenland.
2. Whether the court had subject-matter jurisdiction over the complaint.
3. Whether the complaint should be dismissed sua sponte before service under Federal Rule of Civil Procedure 12(h)(3).

HOLDINGS

1. The plaintiff failed to allege a concrete and particularized injury that he had sustained or was likely to sustain from defendants' alleged actions concerning Greenland, and therefore lacked Article III standing.
2. Because the plaintiff failed to allege facts sufficient to establish Article III standing, the court lacked subject-matter jurisdiction and was required to dismiss the complaint without prejudice before service.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction” (at 1)

“A plaintiff ‘must demonstrate ‘a personal stake in the outcome of the controversy’” to have Article III standing.” (at 2)

“A plaintiff like Mr. Schiff who raises ‘a generally available grievance about government—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—does not state an Article III case or controversy.’” (at 2)

FACTUAL BACKGROUND

Graham Schiff, a United States citizen, challenged the President's asserted unilateral executive power concerning Greenland. He alleged that defendants had publicly suggested or supported creating or using a "Greenland Special Envoy" without statutory authority, congressional authorization, or a treaty or international agreement. He sought, among other relief, a declaration that future executive actions affecting Greenland's sovereignty would be void ab initio.

PROCEDURAL HISTORY

The court granted the plaintiff's application to proceed in forma pauperis. It then sua sponte dismissed the complaint without prejudice for lack of subject-matter jurisdiction because the plaintiff failed to allege an injury in fact sufficient to establish Article III standing.

DISPOSITION

dismissed

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Evans v. Suter, No. 09-5242, 2010 WL 1632902, at *1 (D.C. Cir. Apr. 2, 2010) (per curiam)
- Ananiev v. Freitas, 37 F. Supp. 3d 297, 305 (D.D.C. 2014)
- National Association of Recycling Industries, Inc. v. Secretary of Commerce, 494 F. Supp. 158, 160 (D.D.C. 1980)
- Friends of Animals v. Jewell, 828 F.3d 989, 991-92 (D.C. Cir. 2016)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 560-61, 573-74 (1992)
- Doe v. United States, No. 25-CV-1229, 2025 WL 1895607, at *1 (D.D.C. July 7, 2025)
- Cannady v. Missouri, No. 15-CV-73, 2015 WL 358236, at *1 (D.D.C. Jan. 13, 2015)
- Hall v. D.C. Board of Elections, 141 F.4th 200, 205 (D.C. Cir. 2025)
- Gill v. Whitford, 585 U.S. 48, 65 (2018)

OPINION

Schiff v. Trump

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

GRAHAM SCHIFF,

Plaintiff, v. Civil Action No. 25 - 4571 (UNA) DONALD TRUMP, et al., Defendants.

MEMORANDUM OPINION

This matter is before the court on Plaintiff Graham Schiff's application to proceed in forma pauperis, ECF No. 2, and pro se complaint, ECF No. 1. For the reasons explained below, the court will grant Mr. Schiff's application and dismiss the complaint without prejudice. "Federal courts are courts of limited jurisdiction," and it is generally presumed that "a cause lies outside [of] this limited jurisdiction." *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). Accordingly, "a district court may dismiss a complaint sua sponte prior to service on the defendants pursuant to Fed. R. Civ. P. 12(h)(3) when, as here, it is evident that the court lacks subject-matter jurisdiction." *Evans v. Suter*, No. 09-5242, 2010 WL 1632902, at *1 (D.C. Cir. Apr. 2, 2010) (per curiam); see Fed. R. Civ. P. 12(h)(3) ("If the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action."). "A dispute does not fall within the subject-matter jurisdiction of federal courts unless it qualifies as a 'case' or 'controversy' within the meaning of article III, and it cannot so qualify unless the plaintiff has suffered 'injury in fact.'" *Ananiev v. Freitas*, 37 F. Supp. 3d 297, 305 (D.D.C. 2014) (quoting *Nat'l Ass'n of Recycling Indus., Inc. v. Sec'y of Com.*, 494 F. Supp. 158, 160 (D.D.C. 1980)). Article III standing is

comprised of three elements: “(1) the plaintiff must have suffered an ‘injury in fact’ that is ‘concrete and particularized’ and ‘actual or imminent, not conjectural or hypothetical’; (2) there must exist ‘a causal connection between the injury and the conduct complained of’; and (3) it must be ‘likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision.’” *Friends of Animals v. Jewell*, 828 F.3d 989, 991-92 (D.C. Cir. 2016) (quoting *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560-61 (1992)). Mr. Schiff, a United States citizen, objects to the President’s “assertion of unilateral executive power” with respect to Greenland. ECF No. 1, at 9.1 He alleges that “Defendants have publicly suggested or supported the creation or use of a role styled as ‘Greenland Special Envoy’” without a “statutory basis, congressional authorization, [or] grounding in any treaty or international agreement.” *Id.* (emphases omitted). In Mr. Schiff’s view, such a Special Envoy would “advance unilateral executive aims—by inducement, pressure, or implication—outside constitutional channels, with effects on Greenland’s sovereignty and Denmark’s territorial integrity.” *Id.* (emphasis omitted). Among other relief, he seeks a declaration that any future executive action “purporting to annex, coerce, induce, imply, or otherwise affect Greenland’s sovereignty is void ab initio.” *Id.* at 12 (emphasis omitted). Mr. Schiff fails to sufficiently allege that he has sustained, or is likely to sustain, injury resulting from Defendants’ actions. Mr. Schiff may not pursue the interests of the citizens of Greenland, and he may not bring this action in a representative capacity “because Greenlanders cannot themselves ask this Court” for relief. ECF No. 1, at 10; see *Doe v. United States*, No. 25-CV-1229, 2025 WL 1895607, at *1 (D.D.C. July 7, 2025) (stating that, “[a]s a general rule 1 When citing ECF No. 1, the court refers to the CM/ECF-generated numbers at the top of each page rather than any internal pagination. 2 applicable here, a pro se litigant can represent only himself in federal court” (quoting *Cannady v. Missouri*, No. 15-CV-73, 2015 WL 358236, at *1 (D.D.C. Jan. 13, 2015))); see also 28 U.S.C. § 1654 (providing that “parties may plead and conduct their own cases personally or by counsel”). Mr. Schiff’s demand that Defendants act within the scope of their constitutional authority is also not unique to him. A plaintiff “must demonstrate ‘a personal stake in the outcome of the controversy’” to have Article III standing. *Hall v. D.C. Bd. of Elections*, 141 F.4th 200, 205 (D.C. Cir. 2025) (quoting *Gill v. Whitford*, 585 U.S. 48, 65 (2018)). A plaintiff like Mr. Schiff who raises “a generally available grievance about government—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—does not state an Article III case or controversy.” *Lujan*, 504 U.S. at 573-74. Because Mr. Schiff fails to allege facts sufficient to establish standing, this court lacks subject-matter jurisdiction to hear his claims. Accordingly, the court will grant Mr. Schiff’s application to proceed in forma pauperis, ECF No. 2, and dismiss the complaint without prejudice for lack of subject-matter jurisdiction, ECF No. 1. A contemporaneous order will issue.

LOREN L. ALIKHAN

United States District Judge Date: February 17, 2026 3

