

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)