

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, CHARLESTON DIVISION

M-EDIF, Members of EDIF, W.MJ Boyd, Founder, also known as
Wanda Boyd v. President Donald Trump, et al.

M-EDIF · No. 2:26-1183-RMG · Decided April 19, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts the magistrate judge’s Report and Recommendation and dismisses the pro se action without prejudice and without issuance or service of process. The court concludes that the plaintiff cannot bring a representative action pro se on behalf of M-EDIF and that the complaint fails to state a plausible claim.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Charleston Division
WRITING FOR THE COURT	Richard Mark Gergel
JURISDICTION	United States District Court for the District of South Carolina, Charleston Division
DECIDED	April 19, 2026
DOCKET	2:26-1183-RMG
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending dismissal of a pro se action without prejudice and without issuance or service of process. No timely objections were filed.
STANDARD OF REVIEW	When specific objections to a magistrate judge's Report and Recommendation are timely filed, the district court conducts de novo review of the challenged portions. When no timely specific objections are filed, the district court need only determine whether there is clear error on the face of the record before adopting the recommendation. Pro se pleadings are liberally construed, but liberal construction does not excuse failure to allege facts supporting a viable federal claim.
PRECEDENTIAL VALUE	unknown

PARTIES

M-EDIF, Members of EDIF, W.MJ Boyd, Founder, also known as Wanda Boyd v. President Donald Trump, et al.

TOPICS

pleadings

civil procedure

civil rights

PRACTICE AREAS

civil procedure

civil rights

constitutional law

QUESTIONS PRESENTED

1. What standard of review applies when no timely objection is made to a magistrate judge's Report and Recommendation?
2. Whether a pro se plaintiff may bring a representative action on behalf of an entity.
3. Whether the complaint alleged a plausible federal claim sufficient to avoid summary dismissal.

HOLDINGS

1. When a party fails to file timely specific objections to a magistrate judge's Report and Recommendation, the district court need only satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
2. A pro se plaintiff cannot bring a representative action on behalf of an entity.
3. A complaint that fails to allege facts supporting a plausible federal claim is subject to summary dismissal, even when filed by a pro se litigant.

KEY QUOTATIONS

"Where the petitioner fails to timely file any specific objections, "a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation." (at 1)

"The requirement of liberal construction does not mean that the Court can ignore a clear failure in the pleadings to allege facts which set forth a viable federal claim, nor can the Court assume the existence of a genuine issue of material fact where none exists." (at 2)

FACTUAL BACKGROUND

Plaintiff brought a pro se action against President Trump and various high-ranking members of his administration, alleging violations of Title VI and the Federal Trade Act based on the purported changing landscape of America since 2020. The complaint described M-EDIF as an organization intended to help restore the civil and human rights of Americans affected by structural discrimination. The court concluded that the action appeared to be brought on behalf of that entity and that the complaint failed to state a plausible claim.

PROCEDURAL HISTORY

Plaintiff filed a pro se action against President Donald Trump and other high-ranking administration officials, alleging violations of Title VI and the Federal Trade Act. The magistrate judge recommended summary dismissal because the pro se plaintiff appeared to be bringing the action on behalf of an entity and because the complaint failed to state a plausible claim. After no timely objections were filed, the district court adopted the Report and Recommendation and dismissed the action without prejudice and without issuance or service of process.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Cruz v. Beto, 405 U.S. 319, 322 (1972)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Weller v. Department of Social Services, 901 F.2d 387, 391 (4th Cir. 1990)

OPINION

M-EDIF

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

M-EDIF, Members of EDIF, W.MJ Boyd, Case No. 2:26-1183-RMG Founder, also known as Wanda Boyd Plaintiff, v. ORDER President Donald Trump, et al., Defendants. This matter, brought pro se, is before the Court upon the Report and Recommendation (“R&R”) of the Magistrate Judge (Dkt. No. 11), recommending that the Court dismiss this action without prejudice and without issuance and service of process. Plaintiff was given notice that a party had 14 days from the date of the R&R to file any objection and a failure to file a timely objection would result in limited, clear error review and waiver of the right to appeal the district court’s order. (Id. at 4). No timely objection was filed. For the reasons set forth below, the Court adopts the R&R as the Order of the Court, dismisses this action without prejudice and without issuance and service of process. I. Legal Standard A. Magistrate’s Report and Recommendation The Magistrate Judge makes only a recommendation to this Court. The recommendation has no presumptive weight, and the responsibility for making a final determination remains with this Court. See Mathews v. Weber, 423 U.S. 261, 270-71 (1976). This Court is charged with making a de novo determination of those portions of the R&R to which specific objections are made. See 28 U.S.C. § 636(b)(1). Additionally, the Court may “accept, reject, or modify, in whole or in part, 1 the findings or recommendations made by the magistrate judge.” Id. Where the petitioner fails to timely file any

specific objections, “a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.” *Diamond v. Colonial Life & Accident Ins. Co.*, 416 F.3d 310, 315 (4th Cir. 2005) (citation and punctuation omitted). B. Pro Se Pleadings This Court liberally construes complaints filed by pro se litigants to allow the development of a potentially meritorious case. See *Cruz v. Beto*, 405 U.S. 319, 322 (1972); *Haines v. Kerner*, 404 U.S. 519, 520-21 (1972). The requirement of liberal construction does not mean that the Court can ignore a clear failure in the pleadings to allege facts which set forth a viable federal claim, nor can the Court assume the existence of a genuine issue of material fact where none exists. See *Weller v. Dep’t of Soc. Servs.*, 901 F.2d 387, 391 (4th Cir. 1990) (citation omitted). II. Discussion As the Magistrate Judge accurately noted, Plaintiff appears to bring this pro se action on behalf of an entity by the name of “M-EDIF,” which is described as an organization “to help restore civil and human rights of Americans impacted by the structural discrimination housed in the corners of our government.” (Dkt. No. 1 at 10). The Magistrate Judge correctly concluded that a pro se plaintiff cannot bring a representative action and that such action is subject to summary dismissal. (Dkt. No. 11 at 2). Plaintiff’s action is brought against President Trump and various high ranking members of his administration for alleged violations of Title VI and the Federal Trade Act for “changing landscape of America” since 2020. (Id. at 8-9). The Magistrate Judge further correctly found that 2 the complaint failed to state a plausible claim, providing an additional basis for the summary dismissal of this action. (Id. at 3). Conclusion For the foregoing reasons, the R&R is ADOPTED (Dkt. No. 11) as the Order of the Court, this action is DISMISSED WITHOUT PREJUDICE AND WITHOUT ISSUANCE OR SERVICE OF PROCESS. AND IT IS SO ORDERED. s/ Richard Mark Gergel Richard Mark Gergel United States District Judge April 19, 2026 Charleston, South Carolina 3