

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Matthew Aaron Simpson, II v. State of Michigan

Simpson · No. 25-12694 · Decided November 26, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan grants Matthew Aaron Simpson’s application to proceed in forma pauperis and screens his complaint under 28 U.S.C. § 1915(e)(2)(B). The court dismisses the complaint without prejudice because sovereign immunity bars the action against Michigan and 15 U.S.C. § 1667(5) is a definitions provision that does not support the asserted claim. Related filing and sealing motions are dismissed as moot, and Simpson is given until December 9, 2025, to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Laurie J. Michelson
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	November 26, 2025
DOCKET	25-12694
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed a civil complaint against the State of Michigan, applied to proceed in forma pauperis, and filed miscellaneous motions. The district court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the complaint without prejudice, and dismissed the related motions as moot.
STANDARD OF REVIEW	Mandatory preliminary screening under 28 U.S.C. § 1915(e)(2)(B), requiring dismissal of claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

eleventh amendment immunity

motions to dismiss

consumer protection

statutory interpretation

civil procedure

PRACTICE AREAS

Civil procedure

Federal courts

Sovereign immunity

Truth in Lending Act

QUESTIONS PRESENTED

1. Whether Simpson established indigence sufficient to proceed in forma pauperis.
2. Whether the complaint was subject to dismissal under 28 U.S.C. § 1915(e)(2)(B) because sovereign immunity barred the action against the State of Michigan.
3. Whether the complaint stated a viable claim based on 15 U.S.C. § 1667(5).
4. Whether Simpson's notice of filing and motion to seal should be dismissed as moot after dismissal of the complaint.

HOLDINGS

1. Simpson made the required showing of indigence under 28 U.S.C. § 1915(a)(1), so the court granted his application to proceed in forma pauperis.
2. The complaint against the State of Michigan was barred by sovereign immunity and therefore failed preliminary screening.
3. The complaint failed to state a viable claim based on 15 U.S.C. § 1667(5) because that provision is merely a definitions provision of the Truth in Lending Act.
4. The notice of filing and motion to seal were dismissed as moot following dismissal of the complaint.

KEY QUOTATIONS

“The Court thus finds that Simpson has made the required showing of indigence under 28 U.S.C. § 1915(a)(1) and grants his application to proceed in forma pauperis”

“Simpson’s complaint fails screening on all grounds.”

“If Simpson wishes to file an amended complaint, he must do so pursuant to Federal Rule of Civil Procedure 15 and not as a “supplement” to another motion.”

FACTUAL BACKGROUND

Matthew Aaron Simpson claimed to be the executor or authorized representative of TAKEUSHOME Express Trust and sued the State of Michigan. He invoked 15 U.S.C. § 1667(5) and sought to have his documents recorded privately, stating that he was not an enemy of the state and was a natural person of majority age. He alleged indigence, including no wages, income, or assets, and sought to proceed without prepaying fees and costs.

PROCEDURAL HISTORY

Matthew Aaron Simpson filed a complaint invoking 15 U.S.C. § 1667(5), an application to proceed in forma pauperis, a notice of filing, and a motion to seal. The court found that he established indigence, granted in forma pauperis status, and dismissed the complaint during mandatory preliminary screening because sovereign immunity barred the action and the cited statutory provision was only a definitions provision. The notice of filing and motion to seal were dismissed as moot, and Simpson was given until December 9, 2025, to amend.

DISPOSITION

dismissed

CASES CITED

- McGore v. Wrigglesworth, 114 F.3d 601, 608 (6th Cir. 1997)
- Hans v. Louisiana, 134 U.S. 1, 15 (1890)
- Johnson v. Unknown Dellatifa, 357 F.3d 539, 545 (6th Cir. 2004)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION MATTHEW AARON SIMPSON, II, Plaintiff, Case No. 25-12694 Honorable Laurie J. Michelson v. STATE OF MICHIGAN, Defendant. ORDER GRANTING APPLICATION TO PROCEED IN FORMA PAUPERIS [2] AND DISMISSING COMPLAINT [1] AND MISCELLANEOUS MOTIONS [6, 9] Matthew Aaron Simpson claims to be the executor or authorized representative of TAKEUSHOME Express Trust.

(ECF No. 1, PageID. 5, 9.) He filed a pro se lawsuit against the State of Michigan pursuant to 15 U.S.C. § 1667(5) (id. at PageID.4) for the following relief: “record my documents privately. I am not an enemy of the state. I am a natural person the age of majority” (id. at PageID.6). Simpson wishes to pursue this relief without prepaying Court fees and costs.

(ECF No. 2.) He claims to have no wages, no sources of income, and no assets. (Id.) The Court thus finds that Simpson has made the required showing of indigence under 28 U.S.C. § 1915(a)(1) and grants his application to proceed in forma pauperis (ECF No. 2).

In turn, the Court has an obligation under 28 U.S.C. § 1915(e)(2)(B) to conduct a preliminary screening of Simpson’s complaint and dismiss any claim that is “frivolous or malicious,” “fails to state a claim on which relief may be granted,” or “seeks monetary relief against a defendant who is immune from such relief.” 28 U.S.C. § 1915(e)(2)(B); see McGore v. Wrigglesworth, 114 F.3d 601, 608 (6th Cir.

1997). Simpson’s complaint fails screening on all grounds. First, the doctrine of sovereign immunity precludes this lawsuit against the State of Michigan. See, e.g., Hans v. Louisiana, 134 U.S. 1, 15 (1890); Johnson v. Unknown Dellatifa, 357 F.3d 539, 545 (6th Cir. 2004).

Second, the basis of Simpson's claim is 15 U.S.C. § 1667(5). But this is simply the definitions provision of the Truth in Lending Act. Thus, Simpson's complaint (ECF No. 1) is DISMISSED WITHOUT PREJUDICE. As a result, his notice of filing (ECF No. 6) and Motion to Seal (ECF No. 9) are DISMISSED AS MOOT. If Simpson wishes to file an amended complaint, he must do so pursuant to Federal Rule of Civil Procedure 15 and not as a "supplement" to another motion.

He may have until December 9, 2025, to amend the complaint or this case will be closed. SO ORDERED. Dated: November 26, 2025 s/Laurie J. Michelson LAURIE J. MICHELSON
UNITED STATES DISTRICT JUDGE