United States Court of Appeals for the Fifth Circuit

United States Court of Appeals
Fifth Circuit
FILED
November 4, 2026
Thomas B. Plunkett, III
Clerk

No. 26-60714
Summary Calendar

KATIE YOUNG,

Plaintiff—Appellant,

versus

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES, (MDHS),

Defendant—Appellee.

Appeal from the United States District Court
for the Northern District of Mississippi
USDC No. 4:26-CV-94

Before HAYNES, GRAVES, and RAMIREZ, *Circuit Judges*.

PER CURIAM:[*]

Katie Young, proceeding *pro se* and *in forma pauperis*, brought claims against the Mississippi Department of Human Services. The district court dismissed her action as frivolous and for failure to state a plausible claim for relief. As this was Young's fifth case in two years to be dismissed as frivolous, the district court also barred Young from further *pro se in forma pauperis*

[*] This opinion is not designated for publication. *See* 5TH CIR. R. 47.5.

filings without first obtaining permission from the chief district judge. We affirm.

I. Background

Young applied for SNAP benefits on May 29, 2026. She alleges that she received conflicting information from her case worker and a supervisor regarding the paperwork required to file for benefits based on her disability. Despite her purported confusion, Young was able to successfully submit her SNAP application, and her benefits were added to her SNAP card on June 12, 2026.

Although she received her benefits, Young alleges that the conflicting information she received caused her "emotional distress, lack of sleep, loss of trust, etc." She filed suit, proceeding *pro se* and *in forma pauperis*, alleging violations of the Fourteenth Amendment, the Food and Nutrition Act of 2008, 7 U.S.C. § 2011, and the federal SNAP regulations at 7 C.F.R. Part 273.

The magistrate judge, in his Report and Recommendation, recommended dismissal of her suit with prejudice under 28 U.S.C. § 1915(e)(2)(B) because the suit was frivolous and failed to state a plausible claim for relief. Further, because this was Young's fifth complaint to be dismissed as frivolous over the last two years, the magistrate judge recommended that Young be barred from filing any future *pro se in forma pauperis* complaints without permission from the chief district judge of the court. The district court adopted the Report and Recommendation in full. Young then filed this timely appeal.

II. Jurisdiction & Standard of Review

This case was brought to the district court under 28 U.S.C. § 1331. We have jurisdiction over this appeal under 28 U.S.C. § 1291.

"We review a district court's dismissal of an *in forma pauperis* complaint as frivolous pursuant to 28 U.S.C. § 1915(e)(2)(B)(i) for an abuse of discretion. A claim may be dismissed as frivolous if it does not have an arguable basis in fact or law." *Brewster v. Dretke*, 587 F.3d 764, 767 (5th Cir. 2009) (per curiam) (citation omitted). Further, "our review of a district court's sanctions against vexatious or harassing litigants is conducted under the abuse of discretion standard." *Mendoza v. Lynaugh*, 989 F.2d 191, 195 (5th Cir. 1993).

III. Discussion

The district court did not abuse its discretion when it dismissed Young's complaint. While *pro se* pleadings are afforded liberal construction, Young's receipt of conflicting information about the paperwork required to file for benefits does not constitute the basis for any sort of judicial relief. Because any federal claim had no plausible foundation, Young failed to establish federal question jurisdiction. *See Arbaugh v. Y&H Corp.*, 546 U.S. 500, 513 n.10 (2006). Moreover, it is apparent that Young pleaded her best case in her complaint. *See Brewster*, 587 F.3d at 767–68 (explaining that granting leave to amend is not required under these circumstances); *Ford v. Guthrie*, 101 F. App'x 978, 979 (5th Cir. 2004) (per curiam) ("The district court does not err in dismissing a suit without providing an opportunity to amend where, as here, no viable claim is perceptible from the underlying facts asserted in the plaintiff's pleadings."). Accordingly, the district court properly dismissed her claims as frivolous and for failure to state a claim.

Moreover, the district court did not abuse its discretion when it sanctioned Young under FED. R. CIV. P. 11. *See Gelabert v. Lynaugh*, 894 F.2d 746, 748 (5th Cir. 1990) (per curiam). This is Young's fifth frivolous complaint in two years. Young was also warned about the potential consequences of filing further frivolous complaints in an earlier case. *Young*

v. U.S. Dist. Ct. for N. Dist. of Miss., No. 4:25-CV-153-KHJ-MTP, 2025 WL 3229311, at *3 (N.D. Miss. Nov. 19, 2025); *cf. Mendoza*, 989 F.2d at 196 (concluding that the district court abused its discretion when it imposed a similar sanction without prior warning). Therefore, because Young has already filed five frivolous complaints and because she was on notice that she may be sanctioned, the district court did not abuse its discretion when it prohibited Young from filing further *pro se in forma pauperis* suits without permission from the chief district judge.[1]

IV. Conclusion

For the foregoing reasons, we AFFIRM.

[1] We do respect her statements about religion.