

FACTS

1. Defendant, GRACE AKINLEMIBOLA, has been vindictively sought after by Petitioner as the victim of harassment and malicious prosecution.
2. Defendant is a 2015 juris doctor graduate of Chicago-Kent College of Law and a 2007 bachelors of science degree in accounting graduate from Indiana University-Bloomington.
3. Defendant currently has causes of actions in court against the State of Illinois, Illinois Supreme Court, Illinois Board of Admissions to the Bar, Attorney Registration and Disciplinary Commission, and others in the Seventh Circuit Court of Appeals related to fraudulent assertions made against these same parties by the Defendant for fraud as it relates to her bar examination results. Defendant also has a separate cause of action against Chicago-Kent College of Law related to fraudulent assertions, including as it related to the collusion with a state of Illinois actor.
4. On February 10, 2016, Defendant started her business, The Grace Akinlemibola Corporation. At that time, Defendant was also working in the Chicago Mayor's Office. In or around March of 2016, Defendant disclosed this business on a statement of interest filed with the City of Chicago.
5. The Grace Akinlemibola Corporation has a variety of services offered, including a consulting company, a film production company, and more. The consulting company offers strategic, legal, financial, and leadership consulting.

6. In the first year of operations, the company made over \$3 million dollars. The bulk of this income was derived from a \$2.5 million dollar commission she derived from a financial project that she negotiated with an investor during the fiscal year. She also derived at least half a million from revenue contracts. Under generally accepted accounting principles (GAAP), revenue is recognized when earned and not necessarily when cash is received.
7. On October 3, 2016, Defendant posted on her Facebook account about her business along with a link to her business website, www.gacbusiness.com. This post was a public post that was accessed by not only Defendant's Facebook friends, but also the public at large. On Defendant's Facebook account, Defendant has many Facebook friends who are Chicago-Kent College of Law alumnae who she went to school with, Chicago-Kent alumnae who graduated before Defendant had arrived, Chicago-Kent alumnae who graduated after the Defendant or are currently finishing their degree at Chicago-Kent College of Law.
8. On October 5, 2016, Petitioner made contact with the Defendant informing Defendant that Petitioner had learned about Defendant's website. Petitioner's letter asked for Defendant to respond with specific answers to the following questions: "(1) whether [Defendant is] responsible for the content of the website, www.gacbusiness.com; (2) if [Defendant is] responsible for the website content, why [Defendant] believe[s] [they] are authorized to handle legal services related to patents, business structure formation issues, and contract matters for others; (3) the names and contact information of any clients for whom [Defendant has]

handled any legal services...; and (4) [Defendant's] intentions with respect to future compliance." **Defendant's Exh. A.**

9. On October 8, 2016, Defendant responded to Petitioner's inquiries with a letter that addressed Petitioner's concerns. **Defendant's Exh. B.** This letter that Defendant provided to Petitioner specifically stated legal services provided such as drafting contracts and considering the implications of business structures "are not 'exclusive' to the practice of law." **Exh. B.**
10. On October 17, 2016, Petitioner sent a subpoena to the Defendant requiring her appearance at the Petitioner's office for questioning.
11. On November 15, 2016, Defendant appeared at Petitioner's office for questioning, stating and reiterating her willingness to cooperate with any and all issues or concerns. Petitioner was met with a rude and aggressive nature and tone of questioning, where Petitioner attempted to also berate her after Defendant specifically stated that "every single person...a hundred percent" of clients and potential clients who call, email, or inquire all know Defendant is not an attorney. Defendant further stated that her legal services comprised of negotiating legal disputes and potential legal disputes. Defendant also stated that her client projects came about because her clients knew her work product and "have come to know her" based on the work she has done and has known her to be good. After further interrogating from Petitioner, Defendant also stated that Petitioner was "upset" because the public may view Defendant as an attorney and respect Defendant as an attorney, and the questioning was clear that Petitioner did not want Defendant to be respected as an attorney.

12. Furthermore, as Petitioner only had inquiries related to any “legal” services, Defendant only responded regarding any legal projects.
13. Petitioner then – without Defendant’s notice and without any charges against Defendant – obtained access to Defendant’s bank accounts. Defendant was informed of Petitioner’s comprehensive request via written notification from Defendant’s bank where her main business account is located.
14. Whereas Defendant’s business has suffered from cash flow setbacks from canceled or delayed client payments.

DEFENDANT COUNTERCLAIM #1:
FRAUD

15. Defendant has also been the target of malicious prosecution by the Petitioner based on issues that have already been asked and answered and from which transcripts are documented.
16. Petitioner obtained documentation of a contract with one of Defendant’s clients at the request of Petitioner during the questioning in November of 2016.
17. Petitioner has also intended to use means to steal reciprocity from Defendant’s clients.

DEFENDANT COUNTERCLAIM #2:
EXTORTION

18. Petitioner has also attempted to obtain funds from Defendant based on issues that were asked and answered.

WHEREFORE, Defendant requests this Court grants her petition for counter-claims against the Petitioner in the above-styled case now before this Court.

Respectfully submitted,

BY: _____



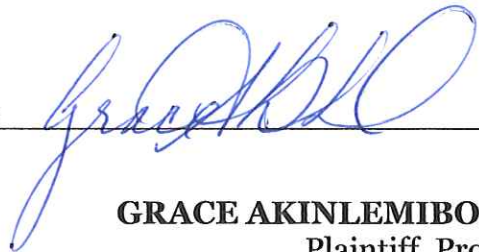
Grace Akinlemibola
Plaintiff, Pro Se
6832 S. Clyde Ave, #1
Chicago, IL 60649

VERIFICATION BY CERTIFICATION

I, under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, Ill. Comp. Stat., ch.735, section 1-109, certify that the statements set forth are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.

Dated: March 27, 2017

BY: _____



GRACE AKINLEMIBOLA
Plaintiff, Pro Se

Exhibit

A



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, Illinois 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

3161 West White Oaks Drive, Suite 301
Springfield, IL 62704
(217) 546-3523 (800) 252-8048
Fax (217) 546-3785

Grace Akinlemibola
The Grace Akinlemibola Corporation
203 N. LaSalle Street, Suite 2100
Chicago, Illinois 60601

Chicago
October 5, 2016

Re: Grace Akinlemibola
in relation to
The Administrator
No. 2016IN04246

Dear Ms. Akinlemibola:

Pursuant to Illinois Supreme Court Rule 779, the Attorney Registration and Disciplinary Commission has the authority to investigate allegations that a person, entity, or association has engaged in the unauthorized practice of law in this state, and if necessary, to pursue court action in connection with such conduct. It has come to our attention that you may have held yourself out as being authorized to provide legal services in this State without authorization from the Supreme Court of Illinois. It is our policy to consider all communications alleging unauthorized practice of law, although our initial inquiries are not intended to lend credence to any allegations they may contain.

We have recently learned about language on a website, www.gacbbusiness.com, which purports to be posted by you. On that website, you appear to indicate that you are the principal in a business, The Grace Akinlemibola Corporation, and that you are authorized to provide legal services to others in this State. The legal services offered on the website include: creating patents, organizing business structures, and negotiating contracts.

The records of this Commission do not reflect that you have been admitted to practice law in Illinois. We are concerned that you are misleading others to believe that you have been granted authority to provide legal advice and services. Under Supreme Court Rule 779 and the Attorney Act, 705 ILCS 205/1 et seq., non-lawyers may not practice law or hold themselves out as being able to practice law. Remedies for violating these statutes and rules include being held in criminal contempt of court, incarceration, fines, injunctive relief, actual damages, and civil penalties. This Commission is authorized to bring court actions to enforce these statutes and rules. Additionally, handling legal matters without authorization or falsely indicating that one is permitted to handle such matters could effect that person's admission to the practice of law.

Letter to Grace Akinlemibola
October 5, 2016
Page 2

To assist us in determining whether any further action by this Commission is warranted, please send us a letter in duplicate within fourteen days responding to the allegations stated above. We specifically request that you provide us with information concerning: (1) whether you are responsible for the content of the website, www.gacbussiness.com; (2) if you are responsible for the website content, why you believe you are authorized to handle legal services related to patents, business structure formation issues, and contract matters for others; (3) the names and contact information of any clients for whom you have handled any legal services, the nature of the matters handled, when you handled such matters, the fees paid to you, and a description of the work that you actually performed; and (4) your intentions with respect to future compliance with the above referenced statutes and rules.

Thank you for your cooperation.

Very truly yours,

A handwritten signature in black ink, appearing to read "S.A. Kozlov", with a long horizontal stroke extending to the right.

Scott A. Kozlov
Senior Counsel

SAK:rm

Exhibit

B

Grace Akinlemibola
203 N. LaSalle St, Ste 2100
Chicago, Illinois 60601

**Attorney Registration & Disciplinary Commission
Of the Supreme Court of Illinois, State of Illinois**
130 E. Randolph Drive, Ste 1500
Chicago, Illinois 60601-6219

RE: The Grace Akinlemibola Corporation

Dear Mr. Kozlov:

On October 7, 2016, I received your letter pertaining to your concerns regarding The Grace Akinlemibola Corporation. I wanted to make sure to address any potential concerns with you by sending you my response as provided herein.

The website does cite that the company is able to offer legal services such as “creating a patent for a financial business method, creating a reorganized business structure for an existing company, and negotiating and developing contracts for a film project.” [Attached: Exhibit A]. As you would like for me to justify the company and the services offered, I would like to provide three very distinct facts: (1) the items listed are also (and oftentimes more-so) associated with business professionals than anyone else, (2) I have not misled any clients in carrying out services, and (3) my comprehensive background justifies the services I purport.

First, the services aforementioned are oftentimes associated with business professionals than anyone else. There are those with a business background, similar to myself, who also are able to understand the implications of business structures or drafting contracts. Tax accountants, financial planners, investment bankers, and even stockbrokers, for example, are required to be well-versed in the implications of business structures as there are implications regarding tax, financial planning, and wealth management. Thus, the previously-mentioned items are not “exclusive” to the practice of law and likely even more associated with a business manager or a professional in the business arena than anything else.

Second, I have not misled any clients in carrying out services. While I graduated from law school, in no capacity have I labeled myself as an “attorney” or the company as a “law firm.” In fact, I have usually explained it to clients that I cannot represent them in an actual courtroom.

Finally, my comprehensive background justifies the services I purport. I graduated from Indiana University-Bloomington’s Kelley School of Business, a top-ten business school, with a degree in accounting. I also graduated from Chicago-Kent College of Law in 2015 with my J.D. (Doctor of Jurisprudence). On top of my education, I have over nine years of professional experience, including many years working with tax and financial planning. Even in prior job experiences, I have had to edit and draft

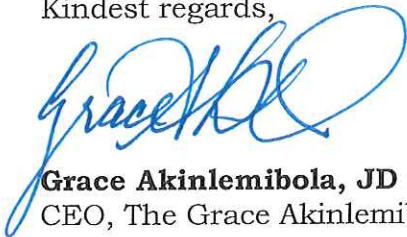
contracts and potential business structures, which would now be even further informed with my legal education and understanding the legal implications.

I do hope that this letter answers all of your concerns. As for sending you detailed itemizations or catalogues: unless you decide to subpoena me, I do not have to send you anything and I will not send you anything.

Please do feel free to contact me via email (gakinlem@gacbusiness.com) if you have further concerns.

Thank you.

Kindest regards,



Grace Akinlemibola, JD
CEO, The Grace Akinlemibola Corporation

Enclosed:

Exhibit A – Website language regarding legal services.

Exhibit B – Public Facebook post regarding The Grace Akinlemibola Corporation.

Exhibit C – Website biography for Grace Akinlemibola.

Supreme Court in *People v. Harding* specifically provided that “[a]lthough...there is no constitutional requirement that a complaint must be verified in order to sustain a criminal prosecution, the Code continues the statutory requirement of a sworn complaint.” 34 Ill. 2d 475 (1966)(citing Ill. Rev. Stat. 1965, chap. 38, par. 111-3(b)).

3. Petitioner states that proceedings should not be dismissed for failure to attach a verification, but rather this Court should grant leave to amend the petition. Yet an amendment would be necessary in the case of a typo or grammatical error, 725 ILCS 5/111-5, and not from committing criminal allegations upon a Defendant.
4. Therefore, Defendant requests that this Court dismiss the above-styled case.

WHEREFORE, Defendant requests this Court grants her Motion to Dismiss the above-styled case now before this Court.

Respectfully submitted,

BY: 

Grace Akinlemibola
Plaintiff, Pro Se
6832 S. Clyde Ave, #1
Chicago, IL 60649

VERIFICATION BY CERTIFICATION

I, under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, Ill. Comp. Stat., ch.735, section 1-109, certify that the statements set forth are true and correct, except as to matters therein stated to be on information and belief, and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.

Dated: March 27, 2017

BY: _____



GRACE AKINLEMIBOLA
Plaintiff, Pro Se