

Argument

A. Plaintiff-Appellant has no other choice but to proceed in forma pauperis.

This Court should grant Plaintiff-Appellant's motion to proceed in forma pauperis because Plaintiff-Appellant has no other choice. The United States Supreme Court has previously provided that "an affidavit is sufficient which states that one cannot, because of his poverty, 'pay or give security for the costs...and still be able to provide' himself and dependants 'with the necessities of life.'" *Adkins v. E.I. DuPont de Nemours Co.*, 335 U.S. 331, 339 (1948). Even as it currently stands, Plaintiff-Appellant has waived her paychecks as a Chief Executive Officer of the company she owns, where she would have received since the pay periods ending December 31, 2017. Plaintiff-Appellant has already previously provided to this Court and the district court that, if she were to pay the \$400 for each case's filing fee, she would be unable to afford basic living expenses. Further considering that Plaintiff-Appellant has faced and continues to face a negative impact towards her career, which further impacts her reputation, Plaintiff-Appellant will need to file these cases at the current time in order to avoid disruption to her business. While Plaintiff-Appellant cannot currently dictate when the business cash flows should increase, Plaintiff-Appellant has already had to postpone the payment of basic corporation expenses such as utilities due to the hardships faced to her business. Thus, paying for the case filing fees would be an undue burden that Plaintiff-Appellant is unable to afford.

B. Denying Plaintiff-Appellant's motion unconstitutionally burdens Plaintiff-Appellant's First Amendment right to free speech.

A denial of Plaintiff-Appellant's motion to proceed in forma pauperis would translate to an unconstitutional burden to Plaintiff-Appellant's First Amendment rights to free. The refusal of Plaintiff-Appellant's motion to proceed in forma pauperis can easily be a form of retaliation based

on the grievances and speech outlined within the lawsuit. The Free Speech Clause of the First Amendment restricts government regulation of private speech and not government speech while still having to maintain compliance with the Establishment Clause. *Borough of Duryea v. Guarnieri*, 564 U.S. 379 (2011). Since the federal district court and the corresponding case dockets would be forums that are limited by the government to certain groups or discussion topics, the federal courts would only be able to curtail speech inasmuch as the restriction is reasonable and viewpoint-neutral. *Pleasant Grove City v. Summum*, 555 U.S. 460 (2009). Although the speech being curtailed is not religious so as to be in conflict with the Establishment Clause, *Lemon v. Kurtzman*, 411 U.S. 192 (1973), the constant refusal of even permitting a case to be heard surrounding a law school within the state of Illinois and a former Illinois Solicitor General is deceitful, where the district court proactively tossed the Plaintiff-Appellant's entire case out of court alongside the motion for in forma pauperis. Considering that Plaintiff-Appellant has cited relevant and specific facts in her complaint pertaining to a law school's engagement in fraudulent acts and acts from an Illinois Solicitor General, denying the motion to proceed in forma pauperis would only serve to unreasonably stifle the facts of this complaint from ever seeing public scrutiny, although viewpoint-neutral. Thus, a denial of the Plaintiff-Appellant's motion to proceed in forma pauperis would be an unconstitutional burden on Plaintiff-Appellant's right to free speech.

C. Justice demands that the Defendants-Appellees answer for their fraudulent acts.

Finally, this Court should grant Plaintiff-Appellant's motion to proceed in forma pauperis because justice demands that the Defendants-Appellees answer for their fraudulent acts. The facts of this lawsuit also surround fraudulent acts that were in concert with Defendant-Appellee CAROLYN SHAPIRO while she was in office as the State of Illinois Solicitor General. To stifle this type of lawsuit without recourse is a reprehensible blow to the people of the state of Illinois and

the city of Chicago as these fraudulent acts will only serve to spread a fraudulent culture within the city of Chicago and the state of Illinois or strengthen those strongholds where a fraudulent culture is already present. Thus, justice and the public would demand that the said government officials and public entities answer for their fraudulent acts.

CONCLUSION

With the foregoing responses and considerations, the Plaintiff-Appellant's motion to proceed in forma pauperis should be granted by this Court.

Respectfully submitted,
BY: 
GRACE AKINLEMIBOLA

Plaintiff-Appellant