

GRACE AKINLEMIBOLA

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EDUCATED NEGRO: THE 2017 ANTI-CORRUPTION CASES

by

Grace Akinlemibola

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Chapters and Legal Complaints by Grace Akinlemibola



ABOUT THE AUTHOR Grace Akinlemibola founded a national conglomerate corporation in 2016 that is now worth over \$1 billion with over 40 brands and products. She has previously worked for Chicago Mayor Rahm Emanuel as an Assistant to the Mayor and later as Deputy Director of Strategic Affairs. In 2017, she filed lawsuits against corruption based on the fraudulent acts from public officials, public entities, and private institutions. She graduated from Chicago-Kent College of Law and Indiana University-Bloomington. She lives in Chicago, Illinois and is finishing an evening master's degree program in Public Policy at Northwestern University.

*“The most disrespected person in America is the black woman.
The most unprotected person in America is the black woman.
The most neglected person in America is the black woman.”*

- Malcolm X

CHAPTER ONE

“How do we ensure minorities such as African-Americans are able to access the benefits of higher education,” I was saying to my Writing and Communications classmates in my master’s degree program at Northwestern University. “How do we ensure these benefits,” I continued, “understanding that the history of ugly racism and discrimination has provided present effects that have consistently barred their involvement?”

I took a glance around the room at my classmates. I was one of two African-Americans in the class of approximately thirty students.

Both of us were females.

I was conducting my oral presentation of my final paper to my classmates. This was our final class, ripe with curiosity and greed. “Greedy” in the sense of needing more information, clarity, questioning.

It was a good thing.

I was trying to stop myself from speeding through my presentation, partly because I did not want to be the first one to get shut down for time like the Sandman at the Night at the Apollo. We were already trying to squeeze in everyone’s presentations and I could already see a white male classmate, who was also an attorney, sitting across the room from me with his eyes seeming to say, “Ma’am, just give me the cliff notes” before I even open my mouth.

Quite frankly, I had spent so much time writing, revising, and editing my final paper that I almost wanted to roll my eyes when they landed on my professor. Not that she was a bad person. She was great, actually. We had our disagreements regarding my

paper throughout the semester, but I always appreciated that she never felt the need to stifle my dissent or disagreements with her. I was always free to speak my mind.

“When it comes to affirmative action, or rather, a school’s policy where race is a factor in the admissions process,” I continued. “I found that while the removal of affirmative action will have dramatic impacts on racial and gender minorities – see, for example, any of the nine states that have passed anti-affirmative action bans – African-American males, in particular, will suffer greatly from the lack of access. Where African-American women will suffer oppression after access is already granted, African-American men face unique hindrances that prevent access to higher education opportunities in the first place. The best way to compare this dichotomy in an analogy would be to highlight an African-American man and an African-American woman in a corporate setting: where the African-American woman is more likely to get passed up for that promotion when compared to the African-American man in a patriarchal society, an African-American man would face unique hindrances in getting that job in the first place.”

I glanced around at my colleagues. Many of them seemed genuinely interested, so I was encouraged in pressing forward. “In 2009, similar to recent years, African-American women dominated the African-American population at 83 percent of accredited law schools. When 1 in 3 African-American boys can expect to spend time in prison during his lifetime and being 2.5 times more likely than their peers in being mislabeled and placed in special education classes, black boys are already hindered in getting to the point of accessing higher education in the first place.

“By taking race into account during the admissions process for higher education, affirmative action is able to account for these hindrances and oppressive circumstances.

Affirmative action can take many forms in a school and current case law has delineated the boundaries of such a policy.”

One of my classmates, a white female who had written her final paper on health care policy as it related to medical practitioners, spoke up. “If you were to put together an affirmative action policy, what would it look like?”

I smiled in response. This was why I loved the class.

“Well, first,” I began to respond. “I would make sure the policy is constitutional. Case law provides that an affirmative action policy must not include strict quotas, not have a workable race-neutral alternative, should be able to withstand strict scrutiny, and – as a subset of the strict scrutiny standard – likely based on diversity. Secondly, depending on the school’s political climate, I may have to keep the school’s ‘nose to the ground’ by preventing unnecessary scrutiny. For example, the University of Michigan had a firestorm of attention, scrutiny, and criticism in 2003, where two back-to-back Supreme Court cases were decided on the same exact day concerning the University of Michigan’s affirmative action policies. Now, it’s important for me to note that the state of Michigan passed an anti-affirmative action ban in 2006, but – assuming affirmative action was still legal in the state – then I may err on the side of caution by basing the policy nontraditionally. It could be based on an intersection of class status or school demographics similar to the state of Texas passing the top 10 percent statute, where the top 10 percent of all high school graduates obtain automatic admission to state colleges. Schools that are predominantly black will automatically have black students included in the demographics. And finally, in addition to the admissions policy, I would want to enhance the outreach efforts to minority candidates, simply because many minority candidates may not have the resources or guidance in packaging their skillsets or

background. Even providing exam-review assistance to students to aid in their SAT or ACT preparation could help increase the credibility of their applications.”

I started discussing how the United States Supreme Court began to place the limitations on affirmative action throughout the years and how the abolishment of affirmative action would uniquely impact African-American men. A couple more classmates asked more questions and my professor had jumped in to ask a question as well. After answering their questions, I wrapped up my summary.

While I studied affirmative action policies as it would impact African-American men, I had first started thinking about the impacts found with varying race-gender intersections at Indiana University-Bloomington when I was finishing college. I had taken a class by a man who I have considered a mentor ever since.

His name was Frank Motley, the Associate Vice Chancellor of Indiana University-Bloomington and Assistant Dean of Indiana University Maurer School of Law, known and beloved by undergraduate and law students alike. He was known to both groups in different ways, but what remained certain is that both groups looked to him as a mentor. He was an older African-American man who taught an undergraduate class called “Race and the Law” that I took at the end of my second year the semester before I pledged my sorority. He used the Socratic method, where students are called upon and a debate among classmates is cultivated. His class was my favorite undergraduate class and the class topics were always refreshing: from affirmative action to segregated bathrooms to current events. I even started my research on the theory of race-gender intersections and providing evidence of a unique intersection in his class. And although the course was intensive with a plethora of readings and a final written examination, every class was interesting.

Perhaps most importantly, he had taken time to get to know us and offer support where necessary. I remember how he changed my entire perception of preparing for examinations when I had spoken with him after class one day.

He had looked over at me and scrunched his nose. “What are you afraid of?” he had asked.

I stared back at him, dumbfounded. “I mean, I guess I just don’t know what to expect—“

“Listen,” he said, cutting me off. “Just think of an exam like game day. This is your time to show off. Show off the dunk you’ve been practicing. You need to look *forward* to game day. The spotlight is on you. Show off.”

I remember having this mentality when taking the bar examination, or even after starting my business and I would create valuation statements to help negotiate a new deal. Even my law school exams provided me with the same mentality. I relished studying the law. Loved it. There was absolutely nothing like it. There were times when I would watch *Suits* and get a high, guessing Harvey’s next move with each scene, and wondering why they chose one alternative over another.

So instead of continuing to hold my life up, I started my own business in February of 2016. On Ash Wednesday, to be exact.

Ever since I was young, I always had visions of being an attorney and owning my own business. There were many businesses in mind. I had visions of owning my own law firm, owning my own accounting firm, owning a mergers & acquisitions firm, creating my own fashion line, writing novels, and pretty much ruling the world. Quite frankly, I

honestly did not think I was going to do *every single thing* I envisioned. I think I thought it was too much for one person to actually do.

Yet there I was on February 10, 2016 with my dreams and visions tattooed on my forehead, every single one of them still as bright in my heart as ever.

I took out the beginning of an old novel I had started to write when I had just graduated college at twenty years old. In the middle of one of the chapters, I saw the question I had posed to myself close to a decade ago. The question now stared back at me boldly.

Where do I see myself in 10 years?

I smiled to myself as I read the three responses I wrote to myself close to a decade ago.

Married. Kids. Doing my own thing.

Being that I was single without any kids and about to start my own business, I cringed before allowing a short laugh. At this point in my life, a decade later, I had gotten comfortable with myself. I was comfortable in my hopes, my aspirations, knowing that I was only on God's time and no one else's. I no longer felt the pressure to be married. I only felt the pressure to be happy. And happiness no longer equated to marriage for me.

That was when I saw myself. It was Ash Wednesday, where many Christians – if they chose to acknowledge Ash Wednesday – may begin a period of fasting and prayer that culminated to Easter, the day Christ resurrected. It was at that moment I saw the

struggles of my life, the disappointments, the failures, the heartaches. Those were my ashes.

From the ashes, you will be made whole.

On that day, God moved me to incorporate the business. In our first fiscal year of ten and a half months, the business made income of over three million dollars although we struggled with cash flow issues as it pertained to working capital since we had set up payment arrangements with clients that was dated even after we had finished rendering services. I currently have employees and we intend to soon expand further. We amassed our first fiscal year income based on gaining consulting contracts with various entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies.

Now, after the end of the first fiscal year, my mind wandered.

My mind traveled back to the summers as a child that I would come back to Chicago with my family to attend various functions with family friends. I would remember staring out the window of the backseat at the most beautiful skyline with “the bright lights” while we drove down Lake Shore Drive.

My mind traveled back to the day I moved back to Chicago after graduating and getting my job with a large accounting firm. I stood on the balcony of my new apartment in the West Loop with a bottle of wine in my hand, my skin bathing in the summer night as my eyes soaked in the view of those same bright lights of downtown in front of me.

My mind then traveled back to the day I started my company, the day I began to understand that all of my dreams were not going to simply fester away, the day I

realized that I was going to be exactly what God intended for me to be whether the world liked it or not.

But now, as I stare out of the window of my office and think about every person who has ever invested in me: my parents, my sisters, the friends who stuck by me through thick and thin, the mentors like Frank Motley, former alderman Freddrenna Lyle, or state senator Kwame Raoul. I wonder if they ever thought whether I was a waste of their time, effort, and support, whether they knew that with every trial and bump in the road, I kept trying to right the ship, always wanting them to know that I was worth the time. I was worth loyalty and worth support.

I was worth it.

CHAPTER TWO

The year was 1961 and the United States was propelling into the height of the Civil Rights Movement: states in the South were “massively resisting”¹ desegregation efforts driven by the passage of *Brown v. Board of Education* – both *I* and *II*² – six years and five years earlier, respectively³; federal troops had to mobilize at Little Rock, Arkansas’ Central High School to protect the nine African-American students from white mobs opposed to integration⁴ four years earlier; and lunch counter sit-ins by black students were beginning to spread throughout the South in protest of segregation. John F. Kennedy, a staunch supporter of the Civil Rights Movement who will later give a speech to propel the passage of the Civil Rights Act of 1964 prior to his assassination, has just been elected President. As a way to promote “positive measures” for equal opportunity, Kennedy signs Executive Order 10925, where government contractors are required “to take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to race, creed, color, or national origin.”⁵ Thus begins the flurry of legal debate, philosophy, and theoretical propositions surrounding this new term called “affirmative action.”

¹ See e.g., *The Last Stand of Massive Resistance: Mississippi Public School Integration, 1970*. (n.d.). Retrieved April 18, 2016, from [http://mshistory.k12.ms.us/articles/305/the-last-stand-of-massive-resistance-1970-\(discussing-Mississippi-as-the-last-state-to-integrate-in-public-schools\)](http://mshistory.k12.ms.us/articles/305/the-last-stand-of-massive-resistance-1970-(discussing-Mississippi-as-the-last-state-to-integrate-in-public-schools)); Massive Resistance. (2016). Retrieved from <http://www.todayingeorgiahistory.org/content/massive-resistance> (discussing how Georgia’s then-Governor Marvin Griffin declared the Supreme Court’s school desegregation cases null and void in the state); Glasrud, Bruce; Ely, James W. (May 1977). “The Crisis of Conservative Virginia: The Byrd Organization and the Politics of Massive Resistance (book review).” *The Journal of Southern History* (Southern Historical Association) 43 (2): 324-325.doi:10.2307/2207385. JSTOR 2207385.

² *Brown v. Board of Education (II)*, 349 U.S. 294 (1955)

³ School Desegregation and Equal Educational Opportunity. (n.d.). Retrieved April 18, 2016, from <http://www.civilrights.org/resources/civilrights101/desegregation.html>

⁴ Civil Rights Chronology. (n.d.). Retrieved April 18, 2016, from <http://www.civilrights.org/resources/civilrights101/chronology.html?referrer=https://www.google.com/>

⁵ Exec. Order No. 10925, 3 C.F.R. (1961).

When President Kennedy signed the Executive Order in 1961, he breathed new life into the corpse of racial equity, where affirmative action became the curative flesh on the bones of injustice and the defining Court cases the chiseling features. The general definition of affirmative action varies with the defining features, but the general foundation remains the same: affirmative action was a race-conscious policy providing an unspecified advantage to racial minorities in the application process or consideration of various benefits, whether it be in higher education or in the workforce. I typically focus on affirmative action as a higher education policy although the case law as it applies to other contexts serves to inform the foundation and analysis to other areas. While affirmative action policies are generally voluntary, the Supreme Court has previously imposed additional race-conscious remedies to correct historical segregation.⁶ Two of the initial justifications for affirmative action programs were to base it as a remedy for prior historical discrimination or to base it upon a need for diversity as substantiated by Justice Lewis Powell's opinion in *Regents of the University of California v. Bakke* in 1978.⁷ From 1978 through 2003, Supreme Court decisions tended to narrow and construe the policies regarding race-conscious admissions. Federal courts had outlawed diversity-based, race-conscious admissions, thus creating the political climate leading to the landmark dual 2003 affirmative action cases found in *Grutter v. Bollinger* and *Gratz v. Bollinger*, which substantially changed the analysis of affirmative action policies.

In a prior paper, I had sought to make a case for affirmative action, not merely from the standpoint of increasing opportunities for racial and gender minorities, but more substantially from the position that certain race-gender demographics – black men,

⁶ *United States v. Fordice*, U.S. 505 717 (1992).

⁷ *Regents of the University of California v. Bakke*, 438 U.S. 265 (1978).

in particular – have faced unique vulnerabilities that have substantially hindered their access to education. In recent Supreme Court cases, the United States Supreme Court has (1) failed oftentimes to acknowledge how these much-needed opportunities are creating access to higher education for such race-gender demographics facing particular susceptibilities such as black men, or (2) recognized the need for affirmative action programs, yet has increasingly – and unjustifiably – dismantled the use of affirmative action programs based on an unwarranted perception that racism no longer exists.

Even more-so an issue, is the fact that others seemed to discredit the race-gender intersection. Those folks would focus more on the rationale that if I, as a black woman, am discriminated against, then I am discriminated against *because* of either my race or my gender, not because the combination of my race and gender produces a measure unique to either demographic alone. The term intersectionality, first coined by Kimberle Crenshaw in 1989, describes the interplay between one’s race and one’s gender as dependent categories creating the unique perspective of the individual.⁸ The categories of race and gender are thus not mutually exclusive, where feminist theory and antiracist theory would then become insufficient since the dominant views in both areas are based on a foundation of experiences that exclude the multiply subordinated. Furthermore, intersectionality theory does not suggest an “additive” nature that assumes greater subordination across additional intersections. Instead, the unique impact on the race-gender intersection is scrutinized.

⁸ Crenshaw, Kimberle (1989). “Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics.” *The University of Chicago Legal Forum*. Vol. 1989: Iss 1, Article 8.

STATISTICAL EVIDENCE OF INTERSECTIONALITY

I conducted a survey of 150 students at Indiana University-Bloomington.⁹ Students were asked their race and gender and further asked if they have ever been discriminated against based on either of these two factors. Of those that indicated being discriminated against, there were a total of sixty females and fifty-two males in the population, sixty-five of which identify as black and forty-seven of which are non-black students. This information is conveyed in the contingency table below.

Table 1. Demographics of Students Discriminated Against

	<i>Black</i>	<i>Non-Black</i>	<i>Total</i>
Females	32	28	60
Males	33	19	52
<i>Total</i>	65	47	112

The null hypothesis will specify that there is no relationship between the two variables – race and gender. This is stated in the following way:

H₀: Race and gender are independent.

The alternative hypothesis specifies that one variable affects the other, expressed as:

H₁: Race and gender are dependent.

If the null hypothesis is true, then race and gender are independent from one another. This signifies that if, for instance, a black female is discriminated against, then the discrimination is founded upon *either* her race *or* her gender. This inherently implies

⁹ Students were asked to disclose their race and their gender. They were then asked questions regarding whether they have or have not been discriminated against based solely on their race, based solely on their gender, or whether they believe any discrimination faced was a combination of the two.

mutual exclusivity. If the alternative hypothesis is true, there would be a dependency between race and gender. This translates into both one's race and gender affecting the extent of discrimination one faces.

Based on the results and the data, I found that there is statistical evidence to conclude of a relationship between race and gender.

CHAPTER THREE

In retrospect, I think of two children – a black female and a black male – that I mentor and consider both to be like a little sister and little brother to me.

Marcus Catchings was a high school junior when I first met him. I was moving into my new condominium in the South Shore neighborhood in Chicago. I was just moving out of my old place that was only a few blocks away. My mother had come from Brownsburg, Indiana, bringing along one of her electricians, Phil, who helps her with repairing some of her properties in Indiana. Both of my parents had started a property management company years ago: my father as the real estate broker and my mother as the property and business manager.

I had looked over at the tall kid with locks, confused as to why he had started to help Phil carry furniture into my new place. I nudged my mother as she was taking measurements of the walls in the kitchen.

“Mom, why is there a random kid carrying my furniture? Do you know this guy?” I had asked her in hushed undertones.

My mother shrugged and waved her hand dismissively. “He saw you and Phil were unloading furniture and had asked Phil if he could help us out for a few bucks. I said you’d give him forty bucks and Phil can have another hand. This way, you can help me inside with some of the repairs and planning.” She paused as she looked over at my slight grimace. “I can take care of paying the boy, if that is a problem.”

I had just closed on this property earlier in the week and had paid cash. My parents, who were in a much better place than when I was growing up, had helped with a little over half of the funds needed to purchase the property, but I had also used the majority of my savings to close on the property as well.

“I just...No, that’s fine. It’s not a problem,” I said quickly.

Over the next few hours, I came to find out Marcus played basketball in his high school. He was in the neighborhood to walk his younger brother from O’Keeffe Elementary School down the block. He always tried to find ways to stay out of trouble, so he would find neighborhood activities such as playing basketball to keep him occupied. I had asked him whether he had thought about colleges he would apply to since he would be a senior soon. He had given me a sufficient answer about looking into a few places, but not really certain. I had pressed him about whether he had given any thought to scholarships to which he replied with hesitation that he had not really given it too much thought. I remembered telling him how there are many scholarships and resources available. He could probably even find a few with a simple Google search.

At the end of the day, I ended up paying him sixty dollars since we ended up doing a lot more extensive work than originally planned and did not finish until well into the evening. I later found out that he also got another forty dollars from Phil. Apparently, Marcus had hinted to Phil that I did not pay him after “all of the hard work he did,” and so Phil paid him forty dollars on his own.

I had scrunched my nose in irritation as Phil was relaying Marcus’s words to me. “Are you kidding me? I even paid him more than we initially told him.” Yet as I sat there

stewing in annoyance at the slander of my good name, I had to look at the positives of the situation.

The kid was a hustler.

Since then, Marcus would stop by occasionally to ask if I needed any help with anything around my place. Sometimes I had things he could help with and sometimes I did not. Either way, I usually would give him a ride to where he requested, especially if he stopped by when it was dark outside. A part of me always wondered why he never let me take him home, but he would always shrug me off and tell me that his mother would get really upset seeing him get dropped off by a “random person.” He said his grandmother was overprotective and would likely go off on the both of us. And although I had offered to meet his family, he had always waved me off. There was a period of time that I did not see him for at least nine months. When I had tried to call him, his phone number had changed. I found myself wishing I had done more.

He turned up over nine months later and, per usual, asked if there was anything he could help with. I did not have anything for him, but I gave him a ride to his aunt’s place and bought him some food on the way. As we traveled in the car, I asked him about college.

“So have you gotten any responses from colleges? You should now be in the end of your senior year of high school, right?”

He lowered his eyes to the bag of food in his lap momentarily. “I just decided to go ahead and work for a while first. I got a job at a hardware store.”

I blinked. “Wait, what? Did you even try to apply to colleges?”

He shook his head. “I was thinking about an Associate’s degree program, but then the money I thought I was going to get with basketball didn’t come through. Besides, I want to go to a school outside of the city.”

I bit back my frustration before exhaling sharply. “What happened to your phone? I tried calling you. You have my number. You can always call or text me.”

“Oh yea, I changed my number,” he said matter-of-factly.

“Okay, well, you should come over next weekend. We’re going to be doing some repairs around the building and I’d love for you to come out to work for the day. My mom will be here. You’ll be working with one of the handymen who can show you how you can help out.”

He gave me his new number as I pulled up to his aunt’s place. It was pouring rain that evening, so he ran out with his bag of food clutched in his arms. He came over that next weekend and my mother was glad to see “my brother” again. The work ended up taking an entire weekend, so Marcus came back the next two days.

His story is a bit different from Derrenisha’s.

Derrenisha King was the eight-year-old I was partnered with during my volunteer sessions with the WITS (Working in the Schools) program. Every year, staff members from Mayor Rahm Emanuel’s Office were able to volunteer to spend a few weeks reading to a child in the program. By reading to children and helping them to read as well, the students usually begin to improve in their reading and writing skills. I was moved by the concept of this program, so I tried to commit to coming once every week throughout the school year.

I was paired with Derrenisha, a sweet, carefree student at Genevieve Melody Elementary School. I remember the first day we met. She smiled in an outgoing manner as I held out my arms to give her a hug.

“I’m Grace,” I said with a wide grin. “And what’s *your* name?”

She gave a short laugh, her teeth glimmering sweetly. “Derrenisha.”

“Ah, Derrenisha, that’s a beautiful name. Looks like you’re stuck with me,” I said jokingly as I glanced at the table of books spread out for volunteers and their partners.

“Do you want to grab a book for us to read?”

She rushed off to the table to get a book for our session. I did not open the book right away since I wanted to get to know her briefly before we began.

I asked about her family and background before beginning our first session. After our first session, many of our sessions began and ended with conversation about her family.

During one of our sessions, I asked her to tell me what she wanted to be when she grew up. I had just gotten up to get a book in addition to the one she picked. I had started picking additional books since I had noticed she would usually gravitate towards books that had very large print and were not as challenging. We had just finished her book choice and were about to start the next book.

“An astronaut,” she said with a smile. She paused momentarily before continuing. “Or a math teacher. I like math.”

I let out a surprised noise, my hands reaching over to give her a high-five. While I majored in accounting and subsequently went to law school, I grew up initially with the mindset that I would get an engineering undergraduate degree, attending Math and Science magnet schools until going to college.

Frankly, I was happy that a young black girl was confessing how much she enjoyed math, so then I started to sneak in a math or science children's book every once in a while. In this way, I started to feel like my own mother, that force who started to always push you to the edge of your abilities, the one who seemed to know exactly what you needed to do before you did it, and the one who knew the rewards of proactiveness.

I always enjoyed the reading sessions, yet nothing could have prepared me for the week I was left speechless. The week was during Black History Month and we were reading a children's book that discussed the life of Rosa Parks. Derrenisha had looked up at me and asked a question that had caught me off guard.

"Why did they do that? Why were they making her sit at the back of the bus?" she had asked.

It was a simple question, but I was at a loss for words. Not because I did not know the answer, but because I was unsure of how to explain it to her young mind without making her feel insecure in her own skin. How do I explain that there was a time when bathrooms were segregated, water fountains were segregated, and even schools were segregated simply because her skin had a beautiful melanin that was unappreciated by the white majority? Should I even explain this concept to her? This concept of racism, an ugly, evil, and vile concept that still lurked in the shadows of our current lives, took a different form in the Civil Rights Era. Did I want her to start paying attention to racism?

I opened my mouth and closed it again, floundering foolishly for the right words. “Well...,” I began slowly. “During that time in history, there were laws that separated people of different races. It doesn’t mean the law was right. So the bus driver asked Rosa to move to the part of the bus designated for blacks. And she fought against it because the law was immoral.”

She rolled her eyes. “Well, they can’t do that now! Because that’s not right. They can’t do that now.”

“Exactly,” I nodded in agreement. A small part of me, however, was trying not to hear pessimism.

Derrenisha ended up making the honor roll at her school that second semester.

Derrenisha and Marcus are the people that come to mind when I think about racism. It was like a roach struggling to survive. Have you ever seen a roach struggling to survive after you have stepped on it or, by some other measure, the roach is now on its back? You may even come back a day or two later and the roach may still be in the same place struggling! Yet...you feel a type of empathy. You are the bigger and more powerful being and the roach is going to die soon enough, so you avoid squashing it to put it out of its misery. You are fairly certain the roach will soon give up and die. Even if the roach were to get back on its feet, the roach is already damaged. Unless there was a magical way for the roach to fully repair from its injury, he is on the road to destruction, so why bother?

I look at the Derrenishas and Marcuses in the world and my breath begins to shorten. How many times have they been touched by the evil of racism, and maybe

never even realizing what exactly it was? I see the more optimistic mind in Derrenisha as a young eight-year-old than I do in the older, more jaded viewpoint of Marcus as a high school graduate. The number of obstacles you face as a black woman or black man will have you on your back, but what if it is difficult for you to get back up? You do not even have the resources to get back up again, yet you may somehow figure out a way to struggle to your side and crawl, always cautious of the ever-powerful being that is lurking and waiting for any signs of life. The big and powerful figure had waited a few days and come back to the same spot, expecting to see you on your back and fully accepting of the fact that you are simply weaker and headed towards death.

In the same vein, the evil of racism lurks and appears in different forms – in your employer, your professor, or the cop who racially profiled you – to see if you have made it off of your back after your first encounter. The evil has returned, expecting you to accept the “fact” that you are weaker. When do you accept the “fact” that you are a lesser being?

When do you accept that you are simply an educated “nigger”?

*“Our progress in degeneracy appears to me to be pretty rapid.
As a nation, we began by declaring that ‘all men are created equal.’
We now practically read it, ‘all men are created equal, except negroes.’ When the
Know-Nothings get control, it will read, ‘all men are created equal, except negroes,
and foreigners, and Catholics.’ When it comes to this I should prefer
emigrating to some country where they make no pretense of loving liberty –
to Russia, for instance, where despotism can be taken pure, and without
the base alloy of hypocrisy.”*

- Abraham Lincoln, Speeches and Writings, 1832-1858



January 21, 2017

Dear friend:

The following pages contain a summary of the complaints and then the finalized complaints that were filed in court for the lawsuits that I filed against certain public officials, public entities, and private institutions. These lawsuits pertain to the fact that I have passed the bar exam three consecutive times and still have not received my license as an attorney, the fraudulent closing of Chicago Public Schools, a law school that has engaged in fraudulent practices, and more.

I personally drafted and did the research for all of the anti-corruption lawsuits. The first five lawsuits were filed on the same day, on January 13, 2017 while the sixth lawsuit was filed pertaining to events occurring the following day. The sixth lawsuit was thus filed on January 20, 2017. After filing the first round of lawsuits, my company, Grakin Corporation, has been handling further efforts where possible.

The following complaints, when read together, provide a background that can be understood in the context of the previous chapters. For any of these lawsuits, I am prepared to take it all the way to the United States Supreme Court, if necessary. These changes do not have to be just Illinois changes, but perhaps this can be the foundation for making changes across our nation and maybe even (dare I say) the world.

Regards,

A handwritten signature in black ink, appearing to read "Grace Akinlemibola". The signature is stylized and cursive.

Grace Akinlemibola

ILLINOIS ANTI-CORRUPTION LAWSUITS

Case #1 of 6: *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel, Michael Rendina, City of Chicago, and Ginger Ostro*

Synopsis: Plaintiff, GRACE AKINLEMIBOLA, seeks remedies for the consequences derived from Defendants' corrupt acts. Plaintiff, a prior employee at Chicago Public Schools in 2012 in the Office of Budget and Grants Management as a Budget Analyst, discovered fraudulent activity in 2015 regarding the 2012 closing of the 50 Chicago Public Schools while she was an employee of Mayor Rahm Emanuel as an Assistant to the Mayor and later as the Deputy Director of Strategic Affairs. Ginger Ostro, Budget Director of Chicago Public Schools in 2012 and Chief Financial Officer of Chicago Public Schools in 2015, fraudulently manipulated Plaintiff's 2012 budget recommendations to be used as empirical justification for the closing of Chicago Public Schools when Plaintiff's budget recommendations never consisted of closing public schools. Not only was Plaintiff's work product manipulated, but Michael Rendina, Senior Advisor to Mayor Rahm Emanuel, intended to frame Plaintiff for the closing of Chicago Public Schools and Rahm Emanuel attempted to fraudulently conceal the news from the media, where Plaintiff discovered in 2015 that the *Chicago Tribune* was about to release a story and sent an email to alert colleagues in the Mayor's Office. Plaintiff advised for the Mayor's Office to disclose the circumstances surrounding Chicago Public Schools, including Plaintiff's name and involvement as a measure of proactiveness. The advice went unheeded. Plaintiff was treated as a second-class citizen for not engaging in fraudulent activity while working in the Office of Mayor Rahm Emanuel, where Michael Rendina amongst others began to malign Plaintiff's reputation.

ILLINOIS ANTI-CORRUPTION LAWSUITS

Case #2 of 6: *Grace Akinlemibola v. City of Chicago, Michael Rendina, Anna Valencia, and Sean Rapelyea*

Synopsis: Plaintiff, GRACE AKINLEMIBOLA, seeks remedies for the consequences derived from Defendants' corrupt acts. Plaintiff, a prior employee in the Office of Mayor Rahm Emanuel, was denigrated by the acts of the Defendants, where the Defendants (1) created a fraudulent culture within the Mayor's Office, and (2) fraudulently manipulated Plaintiff's professional reputation. Defendants communicated to others in and outside of the Mayor's Office that Plaintiff was "dumb" for not conforming to a fraudulent culture. Plaintiff was treated as a second-class citizen for not conforming to a fraudulent culture.

Case #3 of 6: *Grace Akinlemibola v. State of Illinois, Bruce Rauner, Rod Blagojevich, Illinois Supreme Court, Attorney Registration & Disciplinary Commission, Illinois Board of Admissions to the Bar, and Illinois Board of Examiners*

Synopsis: Plaintiff, GRACE AKINLEMIBOLA, seeks remedies for the consequences derived from Defendants' corrupt acts. The State of Illinois has deprived Plaintiff's parents, who were immigrants, and Plaintiff since they have moved to Illinois. The state has been led by Governor Bruce Rauner since January 12, 2015 when he succeeded Governor Patrick Quinn. Governor Patrick Quinn assumed office in 2009 after former Governor Rod Blagojevich, who served as Governor of the state of Illinois from 2003 through 2009, was convicted of corruption in 2009 and sentenced to 14 years in federal prison. Since 2007, Plaintiff has been denied the fundamental constitutional rights to property and liberty in the state of Illinois, and since 2015, Plaintiff has been additionally denied her fundamental constitutional right to free speech. Since 1985, Plaintiff's entire family have been deliberately deprived by the state of

ILLINOIS ANTI-CORRUPTION LAWSUITS

Illinois, where Plaintiff's family moved out of Chicago, Illinois in 1987 and only Plaintiff came back to Chicago, Illinois after graduating with her undergraduate degree in accounting from Indiana University-Bloomington in 2007. Plaintiff's family migrated to the United States in 1978. Plaintiff has found that the state of Illinois, in an effort to prevent corruption in Illinois, attempted to use an overly-broad brush to swipe away the civil rights of immigrants and their families in the United States by preventing those immigrant families with a history with the law from obtaining professional licenses and prosperity within the state of Illinois. Plaintiff has passed the bar exam all three of the times that Plaintiff has sat for the bar exam, and Plaintiff has passed all four sections of the Certified Public Accountant exam in the state of Illinois. Defendants have fraudulently denied Plaintiff of a professional license to practice law and a professional license as a Certified Public Accountant in the state of Illinois. The State of Illinois has now attempted to ruin Plaintiff's business, where her business made over \$3 million dollars in its first fiscal year of only 10 and a half months and is worth slightly over \$1 billion dollars.

Case #4 of 6: *Grace Akinlemibola v. Chicago-Kent College of Law and Carolyn Shapiro*

Synopsis: Plaintiff, GRACE AKINLEMIBOLA, seeks remedies for the consequences derived from Defendants' corrupt acts. Beginning in Plaintiff's first semester of law school in the fall of 2012, Plaintiff was met with a consistent and barbaric assault on Plaintiff's civil rights. Chicago-Kent College of Law professors worked in fraudulent concert to ruin Plaintiff's esteem, reputation, and opportunities. As an example, Plaintiff provides her first-year Contracts exam that was fraudulently manipulated by the professor. Plaintiff also brings this suit against former Illinois Solicitor General Carolyn Shapiro, who is also a Chicago-Kent College of Law professor, as Carolyn Shapiro influences the bar examination results in the State of Illinois.

ILLINOIS ANTI-CORRUPTION LAWSUITS

Case #5 of 6: *Grace Akinlemibola v. Orange Lake Holdings LLP*

1. Synopsis: Plaintiff, GRACE AKINLEMIBOLA, seeks remedies for the consequences derived from Defendants' corrupt acts. Defendant is an international company that does business within the state of Illinois. Defendant has sold Plaintiff one of Defendant's timeshares based on fraudulent statements, fraudulently reducing the value of Plaintiff's timeshare and attempting to coerce Plaintiff into forfeiting her timeshare. Defendant works in concert with Defendant's subsidiary companies. All companies that have committed the fraudulent acts are all different subsidiaries owned by Defendant and controlled by Defendant. Consequently, many creditors were unwilling to finance Plaintiff's business, where Plaintiff's business made over \$3 million dollars in its first fiscal year of only 10 and a half months and is worth slightly over \$1 billion dollars with over 40 different brands or products.

Case #6 of 6: *Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago*

1. Synopsis: Plaintiffs, GRACE AKINLEMIBOLA and HILTON WRIGHT seek remedies for the consequences derived from Defendants' corrupt acts. On January 13, 2017, GRACE AKINLEMIBOLA filed the previous five lawsuits in court against the City of Chicago, the Mayor of Chicago, and more. The day after, on Saturday, January 14, 2017, one of GRACE AKINLEMIBOLA's employees was harassed by four white male Chicago police officers, called a "nigger," locked in a jail cell where he was unable to use the bathroom and was forced to urinate inside of the cell.

PRELIMINARY STATEMENT

1. Plaintiff, GRACE AKINLEMIBOLA, files this lawsuit as the first of a total of five separate lawsuits filed on this same day,¹⁰ where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. This lawsuit herein pertains to the acts directly initiated by Defendants RAHM EMANUEL, MICHAEL RENDINA, CITY OF CHICAGO, GINGER OSTRO, and CHICAGO PUBLIC SCHOOLS. Plaintiff, as a consequence of Defendants' fraudulent acts, has been deprived of her constitutional rights.
3. Plaintiff seeks remedies for the consequences derived from Defendants' corrupt acts. Plaintiff, a prior employee at CHICAGO PUBLIC SCHOOLS in 2012 in the Office of Budget and Grants Management as a Budget Analyst, discovered fraudulent activity in 2015 regarding the 2012 closing of the 50 Chicago Public Schools while she was an employee of Mayor Rahm Emanuel as an Assistant to the Mayor. GINGER OSTRO, Budget Director of Chicago Public Schools in 2012 and Chief Financial Officer of Chicago Public Schools in 2015, fraudulently manipulated Plaintiff's 2012 budget recommendations to be used as empirical justification for the closing of Chicago Public Schools when Plaintiff's budget recommendations never consisted of closing public schools. Not only was Plaintiff's work product manipulated, but MICHAEL RENDINA intended to frame Plaintiff for the closing of Chicago Public Schools and RAHM EMANUEL attempted to fraudulently conceal the news from the media, where Plaintiff discovered that the *Chicago Tribune* was about to release a story and alerted colleagues in the Mayor's Office.
4. Plaintiff was treated as a second-class citizen for not engaging in fraudulent activity while working in the Office of Mayor Rahm Emanuel. When Plaintiff

¹⁰ *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

- always provided alternative solutions to accomplish the goal, Plaintiff was met with resistance.
5. While many may search to find their esteem in life, their purpose for being in a world that may choose to color their outcomes, Plaintiff was meant to be a leader. Her leadership ability started as a member of the Math & Science magnet in high school, where she rose to the top ten percent of her class to become a member of the National Honor Society, a member of the Chess Team and Brain Game team, the captain of her tennis team, and the founder of a debate club, where she was able to get accepted into Stanford University's Junior Statesmen of America summer program but was unable to attend because Plaintiff did not have enough money to pay for the tuition.
 6. She maintained and even broadened her leadership ability in college: as President of her residence hall, she organized a television show mimicking the TLC network show *Trading Spaces* with dorm residents; as a two-term President of the National Association of Black Accountants and with the help of a stellar team, she organized, fundraised, negotiated the contract, and drafted the contract for a guest lecture by Kwame Jackson, the runner-up from the first season of *The Apprentice*; and as President of three different organizations at the same time, she pledged to be a member of her sorority of Delta Sigma Theta Sorority, Inc., where she became Publicity Chair and organized and managed the week-long semester initiatives.
 7. Even while in law school when Plaintiff was suffering from disparate treatment (as noted in a lawsuit filed simultaneously in this Court, *Grace Akinlemibola v. Chicago-Kent College of Law & Carolyn Shapiro*), Plaintiff became the Co-Founder for a Film Series on Race & the Law and was elected the Chair of the Midwest Black Law Students Association, where she organized a Midwest Lobby Day with leaders from the state of Indiana who later hailed her efforts in a concurrent resolution, HCR 26; implemented a first-of-its-kind community service standard across all 52 student chapters in the Midwest; organized a first-of-its-kind regional convention that gained first-ever corporate sponsors in the Indiana Pacers and Eli Lilly & Co.; safeguarded Illinois voting rights; and solicited, negotiated, and managed the

- contract with Phaedra Parks from the *Real Housewives of Atlanta* as the guest speaker.
8. And while working for Mayor Rahm Emanuel, an individual who Plaintiff admired from his post as Chief of Staff to President Barack Obama, Plaintiff was hopeful for an opportunity for leadership in public service. Instead, Plaintiff found fraudulent activity coupled with an antagonism for Plaintiff's beliefs. Her glass slipper had shattered.
 9. Plaintiff started a private business in February of 2016 to create a new avenue of prosperity for herself, where her business made over \$3 million dollars in its first fiscal year of only ten and a half months and is worth slightly over \$1 billion dollars. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products.
 10. Because of Defendants' fraudulent acts, Plaintiff has suffered deep emotional injuries, reciprocity with individuals and elected officials in the City of Chicago, denigration of her esteem as a public servant, and economic damages and opportunity costs. Plaintiff has also been deprived of her constitutional right to liberty as secured by the Thirteenth Amendment and the Fourteenth Amendment of the United States of America. As for Plaintiff's Fourteenth Amendment right to liberty, this right may apply to municipalities such as Defendant CITY OF CHICAGO where the inflicted injury is an execution of a government "custom." *Monell v. New York City Department of Social Services*, 436 U.S. 658 (1978).
 11. Plaintiff seeks compensatory relief in the form of compensatory and punitive damages.
 12. Plaintiff accordingly brings this action to not only protect herself and her self-worth, but to also seek justice.

PARTIES

13. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
14. Defendant RAHM EMANUEL is an individual residing and domiciled in Chicago, Illinois. He currently serves as the Mayor of Chicago, Illinois.
15. Defendant MICHAEL RENDINA is an individual residing and domiciled in Chicago, Illinois.
16. Defendant GINGER OSTRO is an individual residing and domiciled in Chicago, Illinois.
17. Defendant CHICAGO PUBLIC SCHOOLS is the City of Chicago school district in Chicago, Illinois.
18. Defendant CITY OF CHICAGO is a municipal corporation in Chicago, Illinois.

JURISDICTION AND VENUE

19. In addition to state law claims, Plaintiff also brings this action as a violation of liberty rights secured by the Thirteenth and Fourteenth Amendments of the Constitution of the United States of America pursuant to 42 U.S.C. §1983.
20. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331.
21. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391(b)(1) as all defendants reside in the northern judicial district of Illinois. Venue is also proper in this court under 28 U.S.C. §1391(b)(2) because a substantial part of the events or omissions giving rise to the subject claims arose in the city of Chicago.

FACTUAL BACKGROUND

22. Plaintiff, GRACE AKINLEMIBOLA, seeks justice against Defendants who fraudulently manipulated Plaintiff's work product to justify the closing of Chicago Public Schools in 2012.
23. Defendant GINGER OSTRO was the Budget Director for Chicago Public Schools in 2012. GINGER OSTRO later became the Chief Financial Officer for Chicago Public Schools.
24. Plaintiff was a Budget Analyst, where Plaintiff managed the budgets for the Curriculum & Instruction departments which included the Department of Magnet, Gifted & Talented; the Office of Language & Cultural Education; the Department of Assessments; the Department of Arts; Department of Instructional Tools & Technology; the Department of Literacy; the Department of Math & Science; and the Pathways conglomerate that included separate departments.
25. There were initially two Budget Analysts and three Grants Analysts on the Education team, where the Budget Analysts would manage the budgets and the Grants Analysts would manage the CPS grants. All of the Budget Analysts on the Education team were assigned departments that included central department oversight such as the Curriculum & Instruction departments and the Department of Special Education. A third Budget Analyst joined the Education team prior to Plaintiff leaving Chicago Public Schools, where Plaintiff then relieved the Pathways conglomerate onto the new analyst and trained him on how to prepare the Pathways budgets as Plaintiff had found intricacies and issues with the technology that – if not recognized when creating the budgets – can endanger more than one department. Plaintiff discussed this issue with both Dana Brink and GINGER OSTRO, who simply attempted to account for the issue by using a conglomerate approach that did not reconcile with department-level allocations and would have skewed expectations and decision-making if someone who did not know what the budgets consisted of and how to create the budgets. As CHICAGO PUBLIC

- SCHOOLS suffered from high turnover of employees outside of the budget office, many of the department directors would not have had the historical knowledge to inform a Budget Analyst of prior expenditures and rationale for prior allocations.
26. The Budget Manager for the Education team, Dana Brink, dealt more with the high-level questions as would impact the Education departments as a whole than specific department budget management.
 27. In January of 2012, Plaintiff had started a master's degree program at Northwestern University for her Masters in Public Policy & Administration in the evenings while she was working at Chicago Public Schools.
 28. In June of 2012, after Plaintiff had realized she was paid lower than her white male counterparts on the Education team and after Plaintiff provided evidence of outperforming expectations, Plaintiff met with both Dana Brink and GINGER OSTRO to discuss the disparate treatment where her pay was less than her white male counterpart. Plaintiff found the disparate treatment disturbing especially where Plaintiff had negotiated with GINGER OSTRO prior to beginning her role at Chicago Public Schools and Plaintiff had rejected Defendant's initial pay offer of \$52,000 and counteroffered for \$60,000. GINGER OSTRO then cited a public crisis and lack of funds to compensate Plaintiff any more than \$56,000. Plaintiff had then accepted without knowledge that there were white males in the same role who were paid more than Plaintiff at the \$60,000 Plaintiff had originally requested.
 29. When Plaintiff had met with Ginger in June of 2012, GINGER OSTRO was unable to provide an explanation for why her white male counterpart – who had started at approximately the same time as Plaintiff – was paid more than her.
 30. As Plaintiff had noticed other decision-making from GINGER OSTRO that provided a conclusion of racial bias without the humility to fix an issue once brought to her attention, Plaintiff became disgruntled. As Plaintiff had already been accepted to law school at Chicago-Kent College of Law, Plaintiff decided in June of 2012 to attend law school and leave Chicago Public Schools by the time classes would begin in August of 2012.

31. Plaintiff had then spoken with the Chief Instruction Officer, Jennifer Cheatham, regarding potential opportunities in the Curriculum & Instruction departments as Plaintiff had intended to leave the budget office. Plaintiff had initially received a positive response; however, as the Chief Instruction Office had meetings with GINGER OSTRO regarding budget cuts, Plaintiff was informed that they would not be able to open new budget positions.
32. In August of 2012 and prior to the announcing of the closing of CPS schools, Plaintiff left Chicago Public Schools to attend law school.
33. Not long after Plaintiff left, Plaintiff discovered that GINGER OSTRO had promoted Plaintiff's white male counterpart to a Senior Budget Analyst.
34. Plaintiff did not discover until 2015 that a requested document that she had created for the then-Budget Director of Chicago Public Schools ("CPS"), Defendant GINGER OSTRO, while she was an employee at Chicago Public Schools was used as a "data" rationale for the closing of Chicago Public Schools. After Plaintiff announced she was leaving CPS, she provided notice to other budget office internal staff members and Directors of the departments whose budgets she managed so as to provide and set up an adequate training period for those who will take over her departments.
35. When Plaintiff left, she used the remainder of her vacation time to be used after she physically left CPS and informed everyone of Plaintiff's last *physical* day at CPS, which was almost immediately prior to the beginning of fall classes at Chicago-Kent College of Law in 2012. On Plaintiff's last physical day at CPS, Defendant GINGER OSTRO approached Plaintiff for Plaintiff to "find \$100 million in the budget" within one hour for a deadline GINGER OSTRO had to meet. GINGER OSTRO spoke with Plaintiff briefly about a few budget items that GINGER OSTRO seemed to dislike and not want to keep, including the Chief Instruction Office and the entire central department of Math & Science. As Plaintiff had managed the budgets for the Curriculum & Instruction departments and the Pathways departments prior to leaving, Plaintiff created an analysis that only looked at those departments, including any school-based positions that she was aware. The analysis made concessions by closing certain school-based *positions*, and not actual schools,

- along with a few other changes to provide an amount as GINGER OSTRO had requested but would deviate from GINGER OSTRO's seeming intention to remove the Chief Instruction Office and the central education departments.
36. After Plaintiff had provided GINGER OSTRO with the final recommendations, Plaintiff realized her recommendations may be intentionally misconstrued to the departments of the budgets she had managed as a management cut derived by Plaintiff without any of the Curriculum & Instruction and Pathways Directors knowing the time constraints or the "hunt" for a large amount of funds that needed to come from their departments. As Plaintiff had strong relationships with many of the department directors, she immediately went to go speak with Jesch Reyes, the then-Director of the Math & Science Department who was also an African-American, since she believed GINGER OSTRO had negative intentions towards keeping Jesch's position or his department as a budgetary constraint. Plaintiff then informed Jesch Reyes of how Plaintiff was told to find at least \$100 million from the education departments, making sure he understood that GINGER OSTRO had already seemed to have a mind for cutting his department and thus the cuts Plaintiff had made were offered as a compromise.
37. Plaintiff later discovered that GINGER OSTRO used Plaintiff's analysis, where Plaintiff only noted closing school-based positions and *not actual schools*, as justification for closing schools by using the spreadsheet as empirical evidence for closing schools. Plaintiff discovered that GINGER OSTRO had deceitfully reframed Plaintiff's recommendations to highlight a recommendation that Plaintiff *never once* reputed or intended to repute in her spreadsheet analysis.
38. Plaintiff had graduated from law school in May of 2015.
39. In early July of 2015, Plaintiff discovered that Defendant MICHAEL RENDINA, formerly the Director of Legislative Counsel & Government Affairs for Mayor Rahm Emanuel and currently Mayor Rahm Emanuel's Senior Advisor, had discovered the faulty underlying "data" rationale for the closing of the schools after Plaintiff had already started working as an Assistant to the Mayor for Mayor Rahm Emanuel.

40. After finding out, Defendant MICHAEL RENDINA was intending to frame Plaintiff for the fraudulent closing of Chicago Public Schools after making arrangements to ruin Plaintiff's character.
41. Prior to Defendant MICHAEL RENDINA working for Mayor Rahm Emanuel, MICHAEL RENDINA was the Director of Legislative Affairs, a non-education department, at Chicago Public Schools. MICHAEL RENDINA was in his role at Chicago Public Schools while Plaintiff was a Budget Analyst with the education departments at Chicago Public Schools.
42. Plaintiff discovered that Plaintiff's spreadsheet along with a story regarding fraudulent acts at Chicago Public Schools was about to be released in the *Chicago Tribune* that made Plaintiff the source of the school closings at CPS. Plaintiff alerted many Mayor's Office colleagues as to Plaintiff's response and certain facts surrounding the circumstances.
43. In this regard, Plaintiff sent an email to Mayor's Office colleagues requesting for them to inform the public of the school closings and to remove fear by disclosing Plaintiff's name and involvement as Plaintiff was of the mindset that proactiveness would be better in the circumstance.
44. Plaintiff's advice went unheeded.
45. The story that was initially about to be released by the *Chicago Tribune* was ultimately never released.
46. Yet after Plaintiff discovered that the recommendations for the closing of Chicago Public Schools were based on GINGER OSTRO's fraudulent misrepresentations and after the Mayor was informed of the fraudulent closing of Chicago Public Schools, Defendants RAHM EMANUEL and MICHAEL RENDINA enabled and perpetuated the fraudulent act after the discovery with attempts to conceal the fraud from the public.
47. After the discovery, Plaintiff had started to gain leadership in the Mayor's Office as it related to strategic initiatives.
48. Plaintiff had then began to notice that MICHAEL RENDINA had started to malign Plaintiff's reputation by communicating to others in and outside of the Mayor's Office – either through words or through actions – that Plaintiff was “dumb.”

49. In February of 2016, Plaintiff started a private business after finding that MICHAEL RENDINA had started to ruin Plaintiff's reputation in and outside of the Mayor's Office and had been seeking to justify removing Plaintiff from the Mayor's Office and the City of Chicago.
50. Plaintiff publicly disclosed this business on a statement of interest filed with the CITY OF CHICAGO.
51. The business made over \$3 million dollars in its first fiscal year of only ten and a half months and is worth slightly over \$1 billion dollars. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products. While Plaintiff was an employee in the Mayor's Office, Plaintiff was not a payroll employee of the business.
52. In March of 2016, MICHAEL RENDINA had been selected by RAHM EMANUEL to move from his role as Director of Legislative Counsel & Government Affairs in the Mayor's Office to his current role of Senior Advisor in the Mayor's Office. Anna Valencia then replaced MICHAEL RENDINA as Director of Legislative Counsel & Government Affairs in the Mayor's Office.
53. MICHAEL RENDINA created a fraudulent culture, where fraudulent acts and concealment of fraudulent acts became the custom. Others caught on to the fraudulent culture and enabled it to others within the Mayor's Office so as to create more deference for actions that fall within the boundaries of this fraudulent culture.
54. Prior to November 1, 2016 and after she had started her business, Plaintiff was juggling her affiliation as Chief Executive Officer of the business with her former duties as Deputy Director of Strategic Affairs in the Mayor's Office in the City of Chicago. After publicly disclosing her business on statements of interest almost immediately after starting the business, her business had later grown to the point that the Chief of Staff in the Mayor's Office, Eileen Mitchell, had claimed to have the business be an issue over seven months later.

55. During approximately three weeks of negotiation, Plaintiff brought ideas for alternative solutions that could remove any underlying issues. Plaintiff actually arranged an alternative solution that was not a violation of any personnel codes for the City of Chicago and Plaintiff articulated to the Chief of Staff why she believed the solution to be one that could work. She was referred to the Chief of Staff as a matter of judgment since Plaintiff worked in the Mayor's Office and would have more stringent rules based on the perception. Plaintiff was forced to make a decision to dissolve her business, sell her business, or resign from the Mayor's Office due to an ethics judgment. Plaintiff was given until October 31, 2016 to notify the Chief of Staff of her decision. On October 31, 2016, Plaintiff refused to lose the business that she had started with nothing and she refused to resign as she felt her obligations were not complete.
56. Plaintiff was thus terminated from the Mayor's Office on October 31, 2016.
57. Plaintiff seeks compensatory relief in the form of compensatory and punitive damages.
58. Plaintiff accordingly brings this action to not only protect herself and her value, but to also seek justice.

COMPLAINTS AGAINST DEFENDANTS

COUNT I.

§1983 Violation of the Thirteenth Amendment

59. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
60. While the Thirteenth Amendment's violation against slavery and involuntary servitude has been historically also used to bar against forced labor, Plaintiff extends the use of this constitutional amendment to the current facts. Plaintiff was imprisoned by the fraudulent use of her spreadsheet analysis to close 50 Chicago Public Schools and thus was deprived of free will because (1) Plaintiff has been forced to participate in the closing of schools and, (2) because of this

participation, Plaintiff was forced to be relegated to the outskirts of basic civil rights.

61. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

62. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT II.

§1983 Violation of Due Process

63. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

64. Plaintiff was imprisoned by the fraudulent use of her spreadsheet analysis to close 50 Chicago Public Schools and thus was deprived of free will because (1) Plaintiff has been forced to participate in the closing of schools and, (2) because of this participation, Plaintiff was forced to be relegated to the outskirts of basic civil rights.

65. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

66. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT III.

Fraudulent Misrepresentation

67. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

68. Plaintiff was imprisoned by the fraudulent use of her spreadsheet analysis to close 50 Chicago Public Schools and thus was deprived of free will because (1) Plaintiff has been forced to participate in the closing of schools and, (2) because of this participation, Plaintiff was forced to be relegated to the outskirts of basic civil rights.

69. Defendant GINGER OSTRO lied when she asked Plaintiff to create a spreadsheet to discover additional funds. Instead, it is Plaintiff's contention

that Defendant had the mind of closing schools – although Plaintiff had never before heard Defendant discuss closing schools – and, as Plaintiff had already announced she was leaving CPS, Defendant intended to use Plaintiff’s product to “blame the data” on a “former employee.”

70. Plaintiff relied on Defendant’s request.

71. As a direct result of the Defendants’ acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

72. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT IV.

Negligence

73. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

74. CHICAGO PUBLIC SCHOOLS used Plaintiff’s spreadsheet analysis to justify the closing of Chicago Public Schools without taking reasonable steps to fact-check.

75. As a direct result of the Defendants’ acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

76. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues so triable pursuant to FRCP 38(b)(1) and 38(c).

PRAYER FOR RELIEF

The Plaintiff, GRACE AKINLEMIBOLA, respectfully requests that the Court enter a judgment in her favor and against the Defendants as outlined below. For Plaintiff's pain, emotional and mental suffering, infringed constitutional rights, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,000,000,000 (\$1 billion dollars) as follows:

- a. Awarding compensatory damages,
- b. Awarding punitive damages,
- c. Awarding the costs of court and trial expenses, and
- d. Awarding such other and further relief as the Court determines just and proper.

Dated this 13th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

GRACE AKINLEMIBOLA,)

Plaintiff,)

v.)

MICHAEL RENDINA,)

ANNA VALENCIA,)

SEAN RAPELYEA, and)

CITY OF CHICAGO)

Defendants.)

Case No. 1:17-cv-00284

COMPLAINT

COMPLAINT

NOW COMES Plaintiff, GRACE AKINLEMIBOLA (“Plaintiff”), by and through herself as a Pro Se litigant, complaining against Defendants MICHAEL RENDINA, ANNA VALENCIA, SEAN RAPELYEA, and the CITY OF CHICAGO (collectively, the “Defendants”). Plaintiff now respectfully brings this cause of action before this Court.

PRELIMINARY STATEMENT

1. Plaintiff, GRACE AKINLEMIBOLA, files this lawsuit as the second of a total of five separate lawsuits filed on this same day,¹¹ where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. This lawsuit herein pertains to the acts directly initiated by Defendants MICHAEL RENDINA, EILEEN MITCHELL, ANNA VALENCIA, SEAN RAPELYEA, and the CITY OF CHICAGO.
3. Plaintiff and all Defendants MICHAEL RENDINA, EILEEN MITCHELL, ANNA VALENCIA, and SEAN RAPELYEA had all worked together with the Plaintiff in the CITY OF CHICAGO for Mayor Rahm Emanuel, where they (1) created a fraudulent culture within the Mayor's Office and (2) fraudulently manipulated Plaintiff's professional reputation.
4. After a marked point in time, Plaintiff was treated as a second-class citizen by Defendants while working in the Office of Mayor Rahm Emanuel, where Defendants provided others with the perception that Plaintiff was not deserving of a professional reputation and began to fraudulently malign Plaintiff's reputation to other parties. Defendants created a fraudulent culture within the Mayor's Office in their efforts to ruin Plaintiff's reputation, where anyone who did not conform to this culture would be penalized.
5. Defendants communicated that Plaintiff was "dumb" for not conforming to a fraudulent culture.
6. Because of Defendants' fraudulent acts, Plaintiff has suffered deep emotional injuries, reciprocity with individuals and elected officials in the City of Chicago, denigration of her esteem as a public servant, and economic damages and opportunity costs. Plaintiff has also been deprived of her

¹¹ *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

constitutional right to liberty as secured by the Thirteenth Amendment and the Fourteenth Amendment of the United States of America. As for Plaintiff's Fourteenth Amendment right to liberty, this right may apply to municipalities such as Defendant CITY OF CHICAGO where the inflicted injury is an execution of a government "custom." *Monell v. New York City Department of Social Services*, 436 U.S. 658 (1978).

7. Plaintiff seeks compensatory relief in the form of compensatory and punitive damages.
8. Plaintiff accordingly brings this action to not only protect herself and her self-worth, but to also seek justice.

PARTIES

9. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
10. Defendant, MICHAEL RENDINA, is an individual residing and domiciled in Chicago, Illinois.
11. Defendant, ANNA VALENCIA, is an individual residing and domiciled in Chicago, Illinois.
12. Defendant, SEAN RAPELYEA, is an individual residing and domiciled in Chicago, Illinois.
13. Defendant CITY OF CHICAGO is a municipal corporation in Chicago, Illinois.

JURISDICTION AND VENUE

14. In addition to state law claims, Plaintiff also brings this action as a violation of liberty rights secured by the Thirteenth and Fourteenth Amendments of the Constitution of the United States of America pursuant to 42 U.S.C. §1983.
15. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331.
16. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391(b)(1) as all defendants reside in the northern judicial district of Illinois. Venue is also proper in this court under 28 U.S.C. §1391(b)(2) because a

substantial part of the events or omissions giving rise to the subject claims arose in the city of Chicago.

FACTUAL BACKGROUND

17. Plaintiff, GRACE AKINLEMIBOLA, is an individual who previously worked in the Office of Mayor Rahm Emanuel first as an Assistant to the Mayor and then as the Deputy Director of Strategic Affairs.
18. Prior to Defendant ANNA VALENCIA starting her tenure in the Mayor's Office in March of 2016, Plaintiff requested a meeting with Defendant MICHAEL RENDINA, who was the Director of Legislative Counsel & Government Affairs at that time, and SEAN RAPELYEA, in approximately October of 2015, to request a pay raise as she was the least paid in the Mayor's Office of Legislative Counsel & Government Affairs (LCGA).
19. Plaintiff first brought forth examples of her work ethic, especially in solving problems in high-profile situations. She also supplemented all of this information with the fact that she had earned a credible reputation – by that time – for her work product.
20. During this meeting, Plaintiff then pointed out that she had many years of professional experience in the accounting and budgeting industries with highly-visible leadership positions, yet was the least paid staff member on their LCGA teams in their department.
21. During this meeting, Plaintiff stated specifically that she was less concerned with “why” she happened to be paid less than everyone else and was more concerned with fixing the situation without making it a larger issue than what it needed to be.
22. During this meeting, Plaintiff also noted that she graduated from law school and had been maintaining a 4.0 GPA at Northwestern University for her Masters in Public Policy & Administration degree.
23. During this same meeting, MICHAEL RENDINA stated, “We know you do good work.” He also stated that he would try to figure out another solution for her.

24. It was after this meeting that Plaintiff started to notice a marked difference in the way MICHAEL RENDINA and SEAN RAPELYEA treated her. MICHAEL RENDINA and SEAN RAPELYEA began to openly favor another team member, Claudia Chavez, who was on the same Government Affairs team that Plaintiff was on at the time.
25. Plaintiff began to notice that MICHAEL RENDINA had started to malign Plaintiff's reputation by communicating to others in and outside of the Mayor's Office – either through words or through actions – that Plaintiff was “dumb.”
26. Prior to this time, Plaintiff had already been established as a team member who was able to work more independently.
27. ANNA VALENCIA was later appointed to Director of Legislative Counsel & Government Affairs, as MICHAEL RENDINA had shifted to become Mayor Rahm Emanuel's Senior Advisor.
28. When ANNA VALENCIA began working in the Mayor's Office, Plaintiff showed ANNA VALENCIA everything that Plaintiff was working on at the time.
29. MICHAEL RENDINA communicated to others in and outside of the Mayor's Office that Plaintiff was “dumb” for not conforming to a fraudulent culture.
30. As Plaintiff was an African-American female, MICHAEL RENDINA's communication had a compounding effect, where others began to openly ridicule Plaintiff. Plaintiff knows that if she were a white male, the communication offered by MICHAEL RENDINA, ANNA VALENCIA, and SEAN RAPELYEA would not have had that drastic of an impact where Plaintiff would have been ultimately treated as a second-class citizen and openly ridiculed.
31. In Plaintiff's experience, Plaintiff found that high-level, important items that needed to be clarified without confusion were meant to be written or documented in some way. Plaintiff found that the Chief of Staff, Eileen Mitchell, and ANNA VALENCIA were similar to Plaintiff in this regard, although ANNA VALENCIA still practiced a fraudulent culture in other ways.

32. MICHAEL RENDINA and SEAN RAPELYEA, on the other hand, were of the variety where they would consistently change, lie, conceal anything done that could not be corroborated, or attempt to place another person with the blame they want to avoid. As an example, anyone who did not conform to this culture was ridiculed.
33. In February of 2016, Plaintiff started a private business after finding that MICHAEL RENDINA had started to ruin Plaintiff's reputation in and outside of the Mayor's Office and had been seeking to justify removing Plaintiff from the Mayor's Office and the City of Chicago.
34. Plaintiff publicly disclosed this business on a statement of interest filed with the CITY OF CHICAGO.
35. The business made over \$3 million dollars in its first fiscal year of only ten and a half months and is worth slightly over \$1 billion dollars. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products. While Plaintiff was an employee in the Mayor's Office, Plaintiff was not a payroll employee of the business.
36. In March of 2016, MICHAEL RENDINA had been selected by Mayor Rahm Emanuel to move from his role as Director of Legislative Counsel & Government Affairs in the Mayor's Office to his current role of Senior Advisor in the Mayor's Office. ANNA VALENCIA then replaced MICHAEL RENDINA as Director of Legislative Counsel & Government Affairs in the Mayor's Office.
37. ANNA VALENCIA then attempted to manipulate Plaintiff's outcome by lying about Plaintiff's role and lying to other people regarding Plaintiff's role, where Plaintiff had then moved from Mayor's Office of Legislative Counsel & Government Affairs to work with Chief of Staff, Eileen Mitchell.
38. MICHAEL RENDINA created a fraudulent culture, where fraudulent acts and concealment of fraudulent acts became the custom. Others caught on to the fraudulent culture and enabled it to others within the Mayor's Office so as to

- create more deference for actions that fall within the boundaries of this fraudulent culture.
39. Prior to November 1, 2016 and after she had started her business, Plaintiff was juggling her affiliation as Chief Executive Officer of the business with her former duties as Deputy Director of Strategic Affairs in the Mayor's Office in the City of Chicago. After publicly disclosing her business on statements of interest almost immediately after starting the business, her business had later grown to the point that the Chief of Staff in the Mayor's Office, Eileen Mitchell, had claimed to have the business be an issue over seven months later.
 40. During approximately three weeks of negotiation, Plaintiff brought ideas for alternative solutions that could remove any underlying issues. Plaintiff actually arranged an alternative solution that was not a violation of any personnel codes for the City of Chicago and Plaintiff articulated to Eileen Mitchell why she believed the solution to be one that could work. She was referred to Eileen Mitchell as a matter of judgment since Plaintiff worked in the Mayor's Office and would have more stringent rules based on the perception. Plaintiff was forced to make a decision to dissolve her business, sell her business, or resign from the Mayor's Office due to an ethics judgment. Plaintiff was given until October 31, 2016 to notify Eileen Mitchell of her decision. On October 31, 2016, Plaintiff refused to lose the business that she had started with nothing and she refused to resign as she felt her obligations were not complete.
 41. Plaintiff was thus terminated from the Mayor's Office on October 31, 2016.
 42. Since November 1, 2016, Plaintiff has thus been working for her company on the company's payroll.
 43. Plaintiff seeks compensatory relief in the form of compensatory and punitive damages.
 44. Plaintiff accordingly brings this action to not only protect herself and her value, but to also seek justice.

COMPLAINTS AGAINST DEFENDANT

COUNT I.

§1983 Violation of the Thirteenth Amendment

45. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
46. While the Thirteenth Amendment's violation against slavery and involuntary servitude has been historically also used to bar against forced labor, Plaintiff extends the use of this constitutional amendment to the current facts. Plaintiff was imprisoned by the fraudulent culture in the Mayor's Office because (1) Plaintiff was penalized for not conforming to this fraudulent culture and, (2) because of this culture, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
47. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
48. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT II.

§1983 Violation of Due Process

49. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
50. Plaintiff was imprisoned by the fraudulent culture in the Mayor's Office because (1) Plaintiff was penalized for not conforming to this fraudulent culture and, (2) because of this culture, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
51. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
52. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT III.

Fraudulent Misrepresentation

53. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
54. Plaintiff was imprisoned by the fraudulent culture in the Mayor's Office because (1) Plaintiff was penalized for not conforming to this fraudulent culture and, (2) because of this culture, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
55. Defendants lied when communicating to others that Plaintiff was "dumb" for not conforming to the fraudulent culture created by the Defendants.
56. Plaintiff believed she had to conform to Defendants' interpretations of intelligence in order to prosper.
57. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
58. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

PRAYER FOR RELIEF

The Plaintiff, GRACE AKINLEMIBOLA, respectfully requests that the Court enter a judgment in her favor and against the Defendants as outlined below. For Plaintiff's pain, emotional and mental suffering, infringed constitutional rights, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,000,000,000 (\$1 billion dollars) as follows:

- a. Awarding compensatory damages,
- b. Awarding punitive damages,
- c. Awarding the costs of court and trial expenses, and
- d. Awarding such other and further relief as the Court determines just and proper.

Dated this 13th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

PRELIMINARY STATEMENT

1. Plaintiff, GRACE AKINLEMIBOLA, files this lawsuit as the third of a total of five separate lawsuits filed on this same day,¹² where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. This lawsuit herein pertains to the acts directly initiated by the STATE OF ILLINOIS. The Plaintiff has been terrorized by consistent and deliberate fraudulent acts from the STATE OF ILLINOIS and the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION, the ILLINOIS BOARD OF ADMISSIONS TO THE BAR, the ILLINOIS SUPREME COURT, and the ILLINOIS BOARD OF EXAMINERS, which are all agencies of and affiliated with the STATE OF ILLINOIS.
3. Plaintiff seeks remedies for the consequences derived from Defendants' corrupt acts. The State of Illinois has been led by Governor BRUCE RAUNER since January 12, 2015 when he succeeded Governor Patrick Quinn. Governor Patrick Quinn assumed office in 2009 after former Governor Rod Blagojevich, who served as Governor of the state of Illinois from 2003 through 2009, was convicted of corruption in 2009 and sentenced to 14 years in federal prison. Since 2007, Plaintiff has been denied the fundamental constitutional rights to property and liberty in the state of Illinois, and since 2015, Plaintiff has been additionally denied her fundamental constitutional right to free speech. Since 1985, Plaintiff's entire family have been deliberately deprived by the state of Illinois, where Plaintiff's family moved out of Chicago, Illinois in 1987 and only Plaintiff came back to Chicago, Illinois after graduating with her undergraduate degree in accounting from Indiana University-Bloomington in 2007.

¹² *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et. al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

4. Thus, since 2007, Plaintiff has had to live and has been treated as a second-class citizen within the state of Illinois, the state where Plaintiff was born and the state where she intended to build her life.
5. One's fundamental right to liberty is an institution of the Fourteenth Amendment's provision of liberty in the United States' Constitution and Article I of the Illinois Constitution. As the Defendants attempted to restrict Plaintiff's family from ever prospering in the state of Illinois, the state of Illinois desired for Plaintiff's newly transplanted family to leave the state of Illinois.
6. The right to travel freely is not lost on the United States Supreme Court. The Court "long ago recognized that the nature of our Federal Union and our constitutional concepts of personal liberty unite to require that all citizens be free to travel throughout the length and breadth of our land uninhibited by statutes, rules, or regulations which reasonably burden or restrict this movement." *Shapiro v. Thompson*, 394 U.S. 618, 629 (1969).
7. And perhaps, in 1978, when both of Plaintiff's parents migrated to the United States, the state of Illinois felt justified in treating Plaintiff's family disparately. In fact, an immigrant would not have any rights at all according to the state of Illinois. Plaintiff has found that the state of Illinois, in an effort to prevent corruption in Illinois, attempted to use an overly-broad brush to swipe away the civil rights of immigrants and their families in the United States, those who were unprotected in their basic civil rights. While an African-American with generations of stamina in the United States will potentially have relatives with a history with the law, they would not be the target for the state of Illinois in this capacity because they are protected. Although history and recent events in our nation have found that African-Americans are still unequally protected when compared to white Americans, in this particular scenario where the state of Illinois found an opportunity to encroach on the civil rights of an immigrant and "prevent" the disease of corruption from spreading in the state of Illinois because immigrants are protected less. Almost similar to *Minority Report*, the state intended to weed out those immigrants and their families who had any background related to

deceit or potential fraud. Those immigrants were at the bottom of the totem pole: manipulatable and unprotected, unable to achieve professional licenses in the state where they graduated with a college degree and unable to break barriers or earn prosperity that is anything more than ordinary. “Nip it in the bud” is what the state of Illinois would say while using a gun to kill a fly and the bullet traveling through the wall to hurt those on the other side.

8. Defendants accomplished their objectives by committing fraudulent acts, imputing barriers that were hidden behind closed doors and unknown to the public eye. In Plaintiff’s mother, who had sat for the CPA exam in the state of Illinois, the state of Illinois found an immigrant who was making a name for herself and instead of allowing Plaintiff’s mother to answer any questions the state of Illinois had regarding her background, the state of Illinois simply told the Plaintiff she failed on her own wisdom as opposed to failing because of a fraudulent internal policy from the state of Illinois. Where the policy is implemented to propagate and propel fraud by government officials, a culture of fraud begins to form, and where a fraudulent culture is already present, this culture is strengthened.
9. Thus, as Plaintiff discovered before taking the 2015 bar exam, the State of Illinois has deprived Plaintiff’s family (which includes Plaintiff) of basic civil rights and a right to earn a living in Illinois.
10. First, the State of Illinois lacks reciprocity for Plaintiff based on the history of Plaintiff’s relatives within the State of Illinois. Plaintiff is proud to be born to two Nigerian immigrants who instilled in Plaintiff the meaning of self-respect. After migrating to Chicago in 1978, both of Plaintiff’s parents worked while getting degrees. Plaintiff’s parents gave birth to Plaintiff’s older sister in 1980 and gave birth to Plaintiff in 1986 while living in the city of Chicago. Plaintiff’s mother worked while pregnant with Plaintiff and obtaining her degree in accounting from Roosevelt University after transferring from an associate’s degree program from Truman University. Her father as a cab driver while first attending the Illinois Institute of Technology before being removed by immigration authorities from the school and later attending Tri-State University. Under the circumstances of caring for two young children at the

time and getting an undergraduate degree to remove themselves from the hardships, Plaintiff's parents had to use state funding to complete their schooling. It is in the lens of this history that the state of Illinois had obtained specific information that was used as a basis for denying not only Plaintiff's mother in 1985, but also Plaintiff from 2007 through the present day a license as a Certified Public Accountant. Plaintiff has sat for the Certified Public Accountant exam in the state of Illinois a total of 25 times.

11. During one of the times that Plaintiff took the Certified Public Accountant ("CPA") exam, Defendant had lifted the ban, or rather, the "reciprocal adjustment," on Plaintiff's account for a brief window of time. It was during this window that Plaintiff passed the Financial Accounting and Reporting section of the CPA exam before the ban was reimposed. Plaintiff's passing score for the Financial Accounting section expired 18 months later in 2009. Of the 25 times Plaintiff sat for the CPA exam, this passage was the only time Plaintiff passed one of the four sections of the CPA exam.
12. Second, as provided in a separate lawsuit against Chicago Public Schools amongst others filed on the same day as this lawsuit, while she was an employee of Mayor Rahm Emanuel's office, Plaintiff was and has been falsely targeted as the source of the fraudulent closing of Chicago Public Schools in 2012. Plaintiff worked for Mayor Rahm Emanuel beginning in September of 2014 as an Assistant to the Mayor and later as a Deputy Director of Strategic Affairs until October 31, 2016.
13. Third, as provided in a separate lawsuit against Illinois Institute of Technology's Chicago-Kent College of Law, Plaintiff was the target of a malicious and deliberate campaign to ruin Plaintiff's respect within the legal field based on retaliation.
14. Fourth, Plaintiff has passed the bar exam all three of the times that Plaintiff sat for the bar exam, and Plaintiff has passed all four sections of the Certified Public Accountant Exam for the state of Illinois. As an example, Plaintiff can specifically point to the first bar examination of July 2015, where even after Plaintiff arrived late, the Plaintiff's essay scores – without fraudulent interference – were enough to have passed. Defendants ILLINOIS BOARD OF

- ADMISSIONS TO THE BAR and ILLINOIS BOARD OF EXAMINERS have fraudulently denied Plaintiff of a professional license to practice law and a professional license to be reputed as a Certified Public Accountant, respectively, in the state of Illinois.
15. Fifth, after Plaintiff attempted to take another route for her life and create prosperity for her career by starting a business in February of 2016, the State of Illinois and the Attorney Registration and Disciplinary Commission are now attempting to ruin Plaintiff's business, where her business made over \$3 million dollars in its first fiscal year of only 10 and a half months and is worth slightly over \$1 billion dollars.
 16. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products.
 17. Plaintiff, after Defendant has repeatedly targeted Plaintiff's family, is now essentially being told by Defendant STATE OF ILLINOIS and ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION that she cannot have a business in the state of Illinois, where the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION interrogated Plaintiff with unnecessary disrespect.
 18. Through all of the Defendants' actions, Plaintiff has suffered deep emotional injuries and has been deprived of a right to liberty, peace of mind, and two professional licenses that would have greatly enhanced her career earlier on in her life or even with her business.
 19. For disturbing her life and continuing to disturb Plaintiff's life, the Plaintiff seeks justice from the State of Illinois, where the State has fraudulently taken her livelihood from her and continues to pursue a further taking of her esteem.
 20. Plaintiff accordingly brings this action.

PARTIES

21. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
22. Defendant STATE OF ILLINOIS is a state government body.
23. Defendant ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION is an administrative body in the state of Illinois.
24. Defendant ILLINOIS BOARD OF ADMISSIONS TO THE BAR is an administrative body in the state of Illinois.
25. Defendant ILLINOIS SUPREME COURT is the state of Illinois' tribunal that provides administrative and judicial acts, where the Illinois Supreme Court controls, directs, and manages both the ILLINOIS BOARD OF ADMISSIONS TO THE BAR and the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION.
26. Defendant ILLINOIS BOARD OF EXAMINERS is an agency of the state of Illinois that evaluates credentials and approves candidates to be certified as a Certified Public Accountant in the state of Illinois, where the license is issued by the State of Illinois Department of Financial & Professional Regulation.
27. Defendant ROD BLAGOJEVICH is a former governor of the state of Illinois and was governor of the state of Illinois at the time Plaintiff moved back to Chicago and various policies referenced herein were implemented.
28. Defendant BRUCE RAUNER is the current governor of the state of Illinois and was the governor of Illinois during many of the acts and policies referenced herein.

JURISDICTION AND VENUE

29. In addition to state law claims, Plaintiff also brings this action as a violation of rights secured by the Constitution of the United States of America pursuant to 42 U.S.C. §1983.
30. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331.
31. This Court has jurisdiction to review acts of the Illinois Supreme Court, where these acts have served an administrative capacity. *Whitfield v. Illinois Board of Law Examiners*, 504 F.2d 474 (7th Cir. 1974).
32. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391(b)(1) as all defendants reside in the northern judicial district of Illinois. Venue is also proper in this court under 28 U.S.C. §1391(b)(2) because a substantial part of the events or omissions giving rise to the subject claims arose in the city of Chicago.

FACTUAL BACKGROUND

INTRODUCTION

33. Plaintiff seeks remedies for the consequences derived from Defendants' corrupt acts.
34. The State of Illinois implements policy to be adhered to throughout the relevant state agencies and with the influence of relevant state actors. Bruce Rauner is the current elected Governor of the state of Illinois. Rod Blagojevich is a former elected Governor of the state of Illinois and was the governor of Illinois when Plaintiff moved back to Chicago, Illinois to begin her professional career in 2007. Rod Blagojevich was convicted of corruption in 2009.
35. The Illinois Board of Admissions to the Bar is a board appointed, monitored, and managed by the Illinois Supreme Court to oversee the administration of all aspects of bar admissions in the state of Illinois.
36. The Attorney Registration & Disciplinary Commission is an organization charged with the investigation and prosecution of attorneys within the state of Illinois. The Attorney Registration & Disciplinary Commission is also controlled by the Illinois Supreme Court.
37. In 1978, Plaintiff's parents migrated to Chicago, Illinois on a visa. After years of being targeted by the state of Illinois, Plaintiff's family moved from the state of Illinois to Indianapolis, Indiana.
38. In 2007, after Plaintiff graduated with a bachelor's degree in accounting from Indiana University-Bloomington, Plaintiff moved back to Chicago, Illinois, where she intended to build her professional career.
39. Since 2007, Plaintiff has had to live and has been treated as a second-class citizen within the state of Illinois, the state where Plaintiff was born and the state where she intended to build her life.
40. Plaintiff seeks justice against Defendants who have engaged in conspicuous fraudulent acts. Plaintiff seeks injunctive relief and compensatory relief in the form of compensatory and punitive damages.

41. This lawsuit herein pertains to the acts directly initiated by the STATE OF ILLINOIS. The Plaintiff has been terrorized by consistent and deliberate fraudulent acts from the STATE OF ILLINOIS, the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION, the ILLINOIS BOARD OF ADMISSIONS TO THE BAR, the ILLINOIS SUPREME COURT, and the ILLINOIS BOARD OF EXAMINERS, which are all agencies of and affiliated with the STATE OF ILLINOIS.

CRIMINAL RECIPROCITY &

THE DEPARTMENT OF FINANCIAL & PROFESSIONAL REGULATION

42. The State of Illinois lacks reciprocity for Plaintiff based on the history of Plaintiff's relatives within the State of Illinois. Plaintiff's parents, Josiah Akinlemibola and Kofoworola Akinlemibola, have been involved in separate causes of action involving the State of Illinois.
43. Plaintiff's parents migrated from Nigeria to Chicago in 1978 with the use of a visa. Plaintiff's father started to attend Illinois Institute of Technology (IIT) as an engineering major, where he partially used a government grant to attend school at IIT. In 1982, Illinois Institute of Technology reported Plaintiff's father to federal authorities as having lied about his citizenship status on an application to receive government aid for tuition in order to fund his schooling, where he and Plaintiff's mother already had a child together and did not have the means to receive an education that will provide a better outlook for their family. Plaintiff's father, along with several other immigrants, were rounded together by authorities and imprisoned until they received their hearing in court. All of the other immigrants, who had a different presiding judge than Plaintiff's father, were ultimately deported out of the United States based on the judgment of a federal judge in Illinois. Plaintiff's father had a different judge, where the judge presiding over his case determined that Plaintiff's father did not have any prior criminal activity and based on the circumstances where the judge noted in the courtroom that Plaintiff's father was only trying to get an education, should be offered a

- second chance. Thus, Plaintiff's father was allowed to remain in the United States and his record was expunged.
44. After Plaintiff's mother graduated from Roosevelt University in 1984, two years after Plaintiff's father overcame his court battle in the state of Illinois, Plaintiff's mother sat for the Certified Public Examination in the state of Illinois. The ILLINOIS BOARD OF EXAMINERS, based on internal information from the Department of Financial & Professional Regulation, suspected Plaintiff's mother – like Plaintiff's father – to have also used state funds to complete her accounting degree at Roosevelt University.
 45. The State of Illinois had begun to practice a custom that allowed the state to deny professional licenses to anyone with a history or family history of similar activity even where the State of Illinois provides no opportunity for one to answer suspicions or alleviate doubts.
 46. The STATE OF ILLINOIS failed Plaintiff's mother CPA examination.
 47. Plaintiff's father's brother, Wole Michael Akinlemibola, also subsequently came to the United States to settle in the city of Chicago in 1980. After Plaintiff's father finished his undergraduate degree and obtained a job as an engineer with the State of Indiana, Plaintiff's family moved out of Chicago to Indianapolis. Plaintiff's father's brother, Wole Michael Akinlemibola, stayed in Chicago. In 1992, as he was traveling abroad, Plaintiff's father's brother was found to be carrying narcotics and was later convicted of a drug dealing felony and immediately deported back to Nigeria.
 48. Plaintiff's parents have never engaged in any type of drug activity of any kind.
 49. As provided in a separate lawsuit against Chicago Public Schools amongst others filed on the same day as this lawsuit, Plaintiff was falsely targeted as the source of the fraudulent closing of Chicago Public Schools in 2012.

DENIAL OF PROFESSIONAL LICENSES

50. Plaintiff's family members who took professional license examinations in other states passed their respective examination on the first instance in that state. Plaintiff's mother was conflicted with low self-esteem after not passing the CPA exam in Illinois and she no longer pursued the CPA exam after

- moving to Indiana. Plaintiff's mother worked with JP Morgan Chase Bank and was laid off by being forced into early retirement. Plaintiff's mother then started a business that manages and renovates real estate to either rent or "flip," where the business has gained prosperity throughout Indianapolis with an inventory of real estate property.
51. Plaintiff's older sister, Bolanle Sobande, a chemical engineer, passed the first part of the engineering exam in the state of Indiana during her final semester as an engineering major at Purdue University in Indiana. Plaintiff's older sister worked for the United States Air Force and now currently with the United States Department of Defense.
 52. Plaintiff's father, a retired industrial engineer, passed the first part of the engineering exam in the state of Indiana on the first instance and worked for the State of Indiana Department of Transportation for over 25 years before retiring.
 53. In 2015, Plaintiff discovered that the State of Illinois has been and continues to fraudulently deny Plaintiff access to a professional license, where Plaintiff has taken the Certified Public Examination a total of 25 times and has now taken the bar examination to be a licensed attorney a total of 3 times and intends to sit for a fourth time in February of 2017.
 54. Defendants had implemented an internal policy within the state of Illinois that denies reciprocity for candidates who the state suspects is engaged in, or approximate to, suspected dubious activity.
 55. Plaintiff has passed the bar exam all three of the times that Plaintiff sat for the bar exam, and Plaintiff has passed all four sections of the Certified Public Accountant Exam for the state of Illinois. As an example, Plaintiff can specifically point to the first bar examination of July 2015, where even after Plaintiff arrived late, the Plaintiff's essay scores – without fraudulent interference – were enough to have passed. Defendants ILLINOIS BOARD OF ADMISSIONS TO THE BAR and ILLINOIS BOARD OF EXAMINERS have fraudulently denied Plaintiff of a professional license to practice law and a professional license to be reputed as a Certified Public Accountant, respectively, in the state of Illinois.

56. The ILLINOIS BOARD OF ADMISSIONS TO THE BAR were additionally influenced by Plaintiff's law school credentials, which was the product of a malicious and deliberate campaign to ruin Plaintiff's respect within the legal field based on her political affiliations. Plaintiff is contesting the fraudulent activity surrounding Plaintiff's law school career in a separate lawsuit.
57. Plaintiff was additionally falsely targeted as the source of the fraudulent closing of Chicago Public Schools in 2012. Certain individuals who were targeting Plaintiff, as outlined in a different separate lawsuit, could have also influenced the ILLINOIS BOARD OF ADMISSIONS TO THE BAR.

PLAINTIFF'S BUSINESSES

58. Plaintiff started a business in February of 2016 that made over \$3 million in income in the first fiscal year and now has a net worth of over \$1 billion with over 40 different brands and products.
59. Defendants ATTORNEY REGISTRATION & DISCIPLINARY COMMISSION and the STATE OF ILLINOIS have attempted to ruin Plaintiff's entrepreneurial efforts after Plaintiff's business became more credible. After Defendants circumvented her livelihood by refusing Plaintiff's recognition of professional licenses within the State of Illinois, Plaintiff started a business on February 10, 2016. The business, a holding corporation with various subsidiary companies also started by Plaintiff, was called "The Grace Akinlemibola Corporation" and started deliberately on Ash Wednesday of 2016. On that day, Plaintiff was moved strongly to incorporate the business based on a spiritual inclination that saw the business and Plaintiff as a "phoenix" rising from the "ashes."
60. Within the first fiscal year, which was consequently a short tax year ending December 31, 2016, Plaintiff's business accumulated income of over \$3 million and a net worth of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies.

61. Within weeks of Plaintiff first launching her website for the business, www.gacbusiness.com, the STATE OF ILLINOIS, through Scott Kozlov from the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION, contacted Plaintiff concerning her business and whether her business was engaging in the unauthorized practice of law, specifically requesting for Plaintiff to send the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION answers to a list of questions where one of those questions asked for Plaintiff to provide the ATTORNEY REGISTRATION AND DISCIPLINARY with the names and contact information of her clientele. Plaintiff responded back to the inquiry from Mr. Kozlov answering all of their questions that would justify her business's authority in the realm of business and the entrepreneur with the exception of the lists and contact information of her clients, where she was specifically afraid of the ARDC interfering with her client relationships – where every single client she does business for is aware of the fact that she is not a licensed attorney in the state of Illinois – simply for the sake of ruining her reputation and the prosperity of her business. Scott Kozlov from the ARDC then served her with a subpoena to appear at the ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION to provide documents related to legal services or business structure formation issues or contract matters and to testify and provide evidence.
62. In November of 2016, Plaintiff was unnecessarily and rudely questioned.
63. Plaintiff, after Defendant has repeatedly targeted Plaintiff's family, is now essentially being told by Defendant STATE OF ILLINOIS and ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION that she cannot have a business in the state of Illinois.
64. The Plaintiff seeks justice from the State of Illinois, where the State has fraudulently taken her livelihood from her and continues to pursue a further taking of her esteem.
65. Through all of the Defendants' actions, Plaintiff has suffered deep emotional injuries and has been deprived of a right to liberty, peace of mind, and two

professional licenses that could have greatly enhanced her career earlier on in her life or even with her business.

66. Plaintiff accordingly brings this action.

COMPLAINTS AGAINST DEFENDANTS

COUNT I.

§1983 Violation of the Thirteenth Amendment

67. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
68. While the Thirteenth Amendment's violation against slavery and involuntary servitude has been historically also used to bar against forced labor, Plaintiff extends the use of this constitutional amendment to the current facts. Defendant's fraudulent actions forced the Plaintiff to work within the state of Illinois without being adequately compensated for her skillset or knowledge. She has thus been relegated to the outskirts of basic civil rights.
69. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
70. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT II.

§1983 Violation of Substantive Due Process

71. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
72. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
73. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants

COUNT III.

§1983 Violation of Procedural Due Process

74. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
75. Plaintiff's constitutional rights were unjustly taken from Plaintiff without due process.

76. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
77. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants

COUNT IV.

Fraudulent Misrepresentation

78. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
79. Defendant has misrepresented Plaintiff's quality as an attorney and a Certified Public Accountant.
80. Defendant has misrepresented Plaintiff's mother's quality as a Certified Public Accountant.
81. Plaintiff relied on Defendant's representations.
82. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
83. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT V.

Tortious Interference with an Economic Advantage

84. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
85. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
86. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT VI.

Intentional Infliction of Emotional Distress

87. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

88. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

89. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues so triable pursuant to FRCP 38(b)(1) and 38(c).

PRAYER FOR RELIEF

The Plaintiff, GRACE AKINLEMIBOLA, respectfully requests that the Court enter a judgment in her favor and against the Defendants as outlined below.

For the time when Plaintiff was unable to help her mother in a legal action;

For the time when Plaintiff could not help her older sister in a divorce settlement, where Plaintiff attempted to discuss with the attorney and was ignored yet the attorney ended up being fired and Plaintiff's sister remained unrepresented in the final settlement;

For the times when Plaintiff could not defend her own business in official potential legal litigation;

For the times when Plaintiff could not legally defend her condo association;

For the times Plaintiff was openly ridiculed for not passing the bar examination;

For the times Plaintiff was downgraded for not passing the CPA examination;

For all of the times Plaintiff has been asked by friends or employers about her CPA examination and Plaintiff has had to feign indifference;

For the times Plaintiff has had to deal with a potential client who would sneer at Plaintiff upon finding out she was not an attorney;

For all of the friends Plaintiff lost who suddenly did not want to be associated with her;

For all of the times Plaintiff has had to deal with self-righteous and condescending colleagues;

For all of the times a potential employee or current employee has doubted Plaintiff's credibility and left Plaintiff's business;

For all of the times a potential lender has decided not to lend to Plaintiff's business because Plaintiff was not "as credible" as an African-American female businessowner;

For Plaintiff's pain, emotional and mental suffering, infringed constitutional rights, economic damages, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,000,000,000 (\$1 billion dollars) as follows:

- a. Awarding equitable relief in providing Plaintiff with her license to practice law in the state of Illinois,
- b. Awarding equitable relief in providing Plaintiff with her license as a Certified Public Accountant,
- c. Awarding equitable relief in providing Plaintiff's mother with her license as a Certified Public Accountant,
- d. Awarding compensatory damages,
- e. Awarding punitive damages,
- f. Awarding the costs of court and trial expenses, and
- g. Awarding such other and further relief as the Court determines just and proper.

Dated this 13th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

PRELIMINARY STATEMENT

1. Plaintiff files this lawsuit as the fourth of a total of five separate lawsuits filed on this same day,¹³ where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. Plaintiff, GRACE AKINLEMIBOLA, seeks justice against Defendants, CHICAGO-KENT COLLEGE OF LAW and CAROLYN SHAPIRO, who has fraudulently manipulated Plaintiff's livelihood as a law student and thereafter in her pursuit for the license to practice law in the state of Illinois.
3. Beginning in Plaintiff's first semester of law school in the fall of 2012, Plaintiff was met with a consistent and barbaric assault on Plaintiff's civil rights. The evolution of Plaintiff's indignity was startling: from a powerful legal writing professor who threatened her to a law school dean who attempted to justify her disparate treatment to colleagues and classmates who openly ridiculed her.
4. Defendant CHICAGO-KENT COLLEGE OF LAW used their status as a law school then-ranked third in the City of Chicago behind the University of Chicago and Northwestern University and CHICAGO-KENT COLLEGE OF LAW's network of law professors and alumni of CHICAGO-KENT COLLEGE OF LAW to fraudulently manipulate Plaintiff's standing in CHICAGO-KENT COLLEGE OF LAW to denigrate Plaintiff's esteem and opportunities upon graduation.
5. Plaintiff seeks a form of equitable relief and compensatory relief in the form of compensatory and punitive damages.
6. Plaintiff accordingly brings this action to not only protect herself and her value, but to also seek justice.

¹³ *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et. al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

PARTIES

7. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
8. Defendant CHICAGO-KENT COLLEGE OF LAW is the law school for the Illinois Institute of Technology. The school is located in Chicago, Illinois.
9. Defendant CAROLYN SHAPIRO is an individual residing and domiciled in Chicago, Illinois.

JURISDICTION AND VENUE

10. In addition to state law claims, Plaintiff also brings this action as a violation of rights secured by the Thirteenth and Fourteenth Amendments of the Constitution of the United States of America pursuant to 42 U.S.C. §1983.
11. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331.
12. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391(b)(1) as all defendants reside in the northern judicial district of Illinois. Venue is also proper in this court under 28 U.S.C. §1391(b)(2) because a substantial part of the events or omissions giving rise to the subject claims arose in the city of Chicago.

FACTUAL BACKGROUND

INTRODUCTION

13. Plaintiff seeks remedies for the consequences derived from Defendant's fraudulent acts.
14. CHICAGO-KENT COLLEGE OF LAW is a law school affiliated with the Illinois Institute of Technology and is the second-oldest law school in the state of Illinois. It is one of five Chicagoland law schools.

15. Defendant CHICAGO-KENT COLLEGE OF LAW is a law school where many law school students begin their professional careers.
16. Prior to 2012, Plaintiff had already worked for five years professionally in accounting and public service after graduating from Indiana University-Bloomington in 2007 with a degree in accounting.
17. As Plaintiff knew how important law school records were, Plaintiff wanted to make sure she focused on obtaining good grades to get the desired results upon graduation.

PLAINTIFF'S BACKGROUND

18. Plaintiff graduated college at the age of 20 years old in 2007 from Indiana University-Bloomington with a degree in accounting.
19. Plaintiff received her job offer with an accounting firm in Chicago, SMART Business Advisory & Consulting, during her final year of college for Plaintiff to begin upon graduation. At SMART, Plaintiff gained significant work accomplishments with Fortune 500 clients before leaving in 2009 when Plaintiff discovered SMART was having going concern issues. Plaintiff then worked with Thomson Reuters and Chicago Public Schools prior to beginning law school in the fall of 2012.
20. Plaintiff also had unique experiences, including working on the team for a new production film with Executive Producer Freeman Fields and political opportunities with Rahm Emanuel, former Chicago alderman Freddrenna Lyle, and the Democratic Party of Virginia.
21. Plaintiff began law school in the fall of 2012 after Plaintiff had over 5 years of professional work experience and accomplishments.
22. Plaintiff attended law school to expand upon her leadership ability and gain legal credentials. Her leadership ability started as a member of the Math & Science magnet in high school, where she rose to the top ten percent of her class to become a member of the National Honor Society, a member of the Chess Team and Brain Game team, the captain of her tennis team, and the founder of a debate club, where she was able to get accepted into Stanford

- University's Junior Statesmen of America summer program but was unable to attend because Plaintiff did not have enough money to pay for the tuition.
23. Plaintiff maintained and even broadened her leadership ability in college: as President of her residence hall, she organized a television show mimicking the TLC network show *Trading Spaces* with dorm residents; as a two-term President of the National Association of Black Accountants and with the help of a stellar team, she organized, fundraised, negotiated the contract, and drafted the contract for a guest lecture by Kwame Jackson, the runner-up from the first season of *The Apprentice*; and as President of three different organizations at the same time, she pledged to be a member of her sorority of Delta Sigma Theta Sorority, Inc., where she became Publicity Chair and organized and managed the week-long semester initiatives.
 24. Even while in law school when Plaintiff was suffering from disparate treatment as noted further in this complaint, Plaintiff was the Co-Founder for a Film Series on Race & the Law and was elected the Chair of the Midwest Black Law Students Association, where she organized a Midwest Lobby Day with leaders from the state of Indiana who later hailed her efforts in a concurrent resolution, HCR 26; implemented a first-of-its-kind community service standard across all 52 student chapters in the Midwest; organized a first-of-its-kind regional convention that gained first-ever corporate sponsors in the Indiana Pacers and Eli Lilly & Co.; safeguarded Illinois voting rights; and solicited, negotiated, and managed the contract with Phaedra Parks from the *Real Housewives of Atlanta* as the guest speaker.
 25. Plaintiff graduated law school from CHICAGO-KENT COLLEGE OF LAW in May of 2015, where Plaintiff had already been working full-time for Mayor Rahm Emanuel as an Assistant to the Mayor and later as the Deputy Director of Strategic Affairs.
 26. Immediately prior to beginning law school, Plaintiff began a Master's degree program in Public Policy & Administration at Northwestern University. Plaintiff has maintained a 4.0 grade point average in that program.
 27. Plaintiff started a private business in February of 2016 to create a new avenue of prosperity for herself, where her business made over \$3 million dollars in

accrual-based income its first fiscal year of only ten and a half months and is worth slightly over \$1 billion dollars. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products.

LAW SCHOOL

28. During Plaintiff's first semester of law school at CHICAGO-KENT COLLEGE OF LAW in the fall of 2012, Plaintiff had Sanford Greenberg as a Professor for Legal Writing I who was a powerful and senior professor in the school.
29. Sanford Greenberg had humiliated Plaintiff on the first day of class regarding his own confusion on Plaintiff not turning in an introductory fact sheet that asked students questions of their undergraduate institution, work experience, and other informative questions. Plaintiff was confused and expressed that she did, in fact, turn in the missing fact sheet. Plaintiff and Sanford Greenberg had later found out that there was a miscommunication regarding the mailbox that the sheet was deposited and Plaintiff attempted to ease any negative reciprocation towards Plaintiff by making sure he understood the situation.
30. Plaintiff and Sanford Greenberg seemed to come to an understanding after that moment, but Plaintiff recalled that Sanford Greenberg's reaction was disproportionate and likely produced a negative reaction against Plaintiff amongst her classmates, where Plaintiff was one of two African-Americans in the classroom and Sanford Greenberg's reaction provided the impression that Plaintiff was "lazy" or "incompetent."
31. For her first Legal Writing I paper in Sanford Greenberg's class, he reduced Plaintiff's score by close to thirty percentage points.
32. Plaintiff was angry and discussed the grade with him in his office, where Sanford Greenberg ultimately threatened Plaintiff when she asked about appealing the grade.

33. Plaintiff did not say anything to the dean of the school immediately after the conversation.
34. Plaintiff then became aware that the incident between Plaintiff and Sanford Greenberg had seemed to have been recognized by other faculty members.
35. At or around the end of the first semester, Plaintiff spoke with the dean of the school, Stephen Sowle, about the situation with her Legal Writing I professor.
36. Stephen Sowle did not help her to appeal the grade, but instead had Plaintiff switch Legal Writing sections for the second semester.
37. Many of the professors at Chicago-Kent College of Law, including all of her first year professors, worked in fraudulent concert with the other to fulfill a negative objective with Plaintiff's law school career to place Plaintiff beneath her classmates in the school.
38. During Plaintiff's first year of law school, Plaintiff received a C- in Contracts, where her final exam was fraudulently altered by the professor whose name was Richard Warner.
39. Plaintiff spoke with Richard Warner and retained a copy of the exam as her Contracts professor had graded it. Exhibit B. Upon review, Plaintiff found and Plaintiff informed the professor that the diagram Plaintiff had made was missing.
40. For the exam, Plaintiff had created a diagram pertaining to the Contracts doctrine of Excuses in a clear way that allowed Plaintiff to better describe the impact of the timing for terminating a contract, specifically aligning where the contractual repudiation is taking place compared to the stage of the contract. Exhibit C.
41. Plaintiff created the diagram as she had found the trend of making a contract null and void became more solidified if one distinguished the contract stages with a "negotiation" stage recognized.
42. Richard Warner allowed an open book exam, where students "may use material on your computers, as well as commercial or personal printed materials." Exhibit A. Plaintiff was thus authorized and able to access her hard drive and copy/paste a diagram Plaintiff had created while she was studying for her Contracts final. Richard Warner also had told students

- during a review session that students would be able to copy/paste from their hard drive – likely from their notes – into the exam screen.
43. The diagram Plaintiff created showed up clearly onto the examination screen on the day Plaintiff took the exam as Plaintiff had saved the diagram as a .jpg file. The diagram had shown up similar to pasting a picture file into a Word document.
44. A law school examination, like the bar examination, compares a student's answers with their classmate's not to a "specific" answer key. The examination grade would allow a student to find how their answer compares to other students who answered the same question. Although "uniqueness" should not be penalized, Richard Warner and other CHICAGO-KENT COLLEGE OF LAW professors seemed to discredit unique arguments or repute insignificance in regards to Plaintiff.
45. While Plaintiff would not typically dispute a degree grade point average, the fact that Plaintiff found multiple instances of fraud amongst the professors in regards to her grades made Plaintiff question the truthfulness of Plaintiff's grade point average.
46. Plaintiff found that Plaintiff's law school professors justified Plaintiff's grades by showing Plaintiff the "rubric," where the professors had their own answer key where many of them included an "overexhaustive" list of issues to be provided, as opposed to comparing Plaintiff to Plaintiff's classmates. These professors included, but are not limited to: Richard Warner for Contracts, Steven Heyman for Criminal Law, Mickie Piatt for Torts, Joan Steinam for Civil Procedure, and Stephen Sowle for Legislation.
47. Many of her classmates saw the way Plaintiff was treated by professors in the school, who held the power to their futures in their purview, and began to mock and openly ridicule Plaintiff. Some students would even attempt to bully and intimidate Plaintiff even while in class.
48. Plaintiff discovered during her first year that a classmate had spread a false rumor about Plaintiff that Plaintiff had slept with a white male classmate whom Plaintiff never even spoke or associated with. Plaintiff is unsure which classmate started the rumor. This rumor had found its way amongst the

- faculty as professors in Plaintiff's classes during the first year began to make sexual innuendos and sexual jokes. Plaintiff's classmates would also make sexual innuendos in their class comments.
49. Plaintiff, during her first semester, may have shown affinity for the white male classmate as she had emailed him her class notes – unsolicited – when she happened to notice that he did not make it into class one day. Plaintiff felt as if she were “penalized” for showing an affinity for a white male classmate since Plaintiff had kept to herself during the first semester especially because she wanted to focus on getting good grades. Thus, Plaintiff had refrained from socializing during her first semester since she did not want any reasons that would allow a setback in her study schedule.
 50. Plaintiff was not sexually intimate with anyone during her time in law school.
 51. Plaintiff changed sections for the second semester and decided not to show affinity towards most males in the school.
 52. Plaintiff also believes that many of Plaintiff's classmates attempted to justify their perception of Plaintiff based on Plaintiff's final year first semester, where Plaintiff took Intensive Trial Advocacy. Intensive Trial Advocacy compressed a full semester course into a span of two weeks.
 53. One of the course instructors was a current sitting judge in the Circuit Court of Cook County, where the judge and professor had made a demoralizing remark during the first week in reference to Plaintiff as Plaintiff was not as adjusted to trial techniques being that she had spent most of her time on more transactional areas of law and was not involved in trial team.
 54. While Plaintiff had made it into the top 20% of her class for her appellate advocacy oral arguments during her second semester of law school to advance to the second round, Plaintiff did not try out for the Moot Court team nor the trial team and had spent her time on more transactional-related areas of the law aside from being in the courtroom.
 55. Many of Plaintiff's classmates in Intensive Trial Advocacy were already on the school's trial team so Plaintiff had to adjust accordingly.
 56. Plaintiff found that many of the other students did not want to be in a group with Plaintiff. The team member and “Co-Counsel” Plaintiff was first

- assigned, who was also a member of the school's trial team, worked independently. Plaintiff also found that this team member had withheld information to intentionally embarrass the Plaintiff during the actual trial.
57. Plaintiff did better for Trial Advocacy II the next semester, where she received a grade of A-.
58. At the end of the three years, Plaintiff was ranked at the bottom of the class of Plaintiff's 2015 class of 280 students.

BAR EXAM INTERFERENCE

59. Defendant CAROLYN SHAPIRO is the former Illinois Solicitor General from 2014 through 2016.
60. CAROLYN SHAPIRO is a professor at Chicago-Kent College of Law.
61. Before CAROLYN SHAPIRO was Illinois Solicitor General, Michael Scodro – also a Chicago-Kent professor – was Illinois Solicitor General from 2006 through 2014.
62. As Solicitor General, CAROLYN SHAPIRO oversaw attorneys' work in the United States Supreme Court, Illinois Supreme Court, and the federal and state appellate courts.
63. The Illinois Supreme Court oversees the administration, maintenance, and professional licensing of attorneys in the state of Illinois.
64. Plaintiff was intentionally targeted by Chicago-Kent professors, with the inclusion of CAROLYN SHAPIRO, in an effort to justify Plaintiff's final class ranking at Chicago-Kent College of Law and for the fraudulent efforts against Plaintiff not to be discovered.
65. CAROLYN SHAPIRO influences the support a bar exam candidate receives towards passage or failure.
66. Plaintiff failed the bar exam on three separate occasions and is sitting for the upcoming bar exam administration in February of 2017.
67. Plaintiff accordingly brings this action to not only protect herself, but to also seek justice.

COMPLAINTS AGAINST DEFENDANT

COUNT I.

§1983 Violation of the Thirteenth Amendment

68. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
69. While the Thirteenth Amendment's violation against slavery and involuntary servitude has been historically also used to bar against forced labor, Plaintiff extends the use of this constitutional amendment to the current facts. Plaintiff was imprisoned by CHICAGO-KENT COLLEGE OF LAW professors working in fraudulent concert and thus was deprived of free will because (1) Plaintiff was penalized for not participating in school activities and for speaking out against fraudulent acts and, (2) because of this participation, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
70. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
71. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT II.

§1983 Violation of Due Process

72. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
73. Plaintiff was imprisoned by CHICAGO-KENT COLLEGE OF LAW professors working in fraudulent concert and thus was deprived of free will because (1) Plaintiff was penalized for not participating in school activities and for speaking out against fraudulent acts and, (2) because of this participation, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
74. As CHICAGO-KENT COLLEGE OF LAW professors worked in conjunction and intentionally with the State of Illinois Solicitor General CAROLYN SHAPIRO, CHICAGO-KENT COLLEGE OF LAW should be deemed a state actor.

75. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
76. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT III.

§1983 Violation of Free Speech

77. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
78. Plaintiff was imprisoned by CHICAGO-KENT COLLEGE OF LAW professors working in fraudulent concert and thus was deprived of free will because (1) Plaintiff was penalized for not participating in school activities and for speaking out against fraudulent acts and, (2) as many in the school were aware of Plaintiff's political activities and history, Plaintiff was penalized whenever she would express viewpoints that went against any of the professors' viewpoints. Because of Plaintiff's unique or different views, Plaintiff was forced to be relegated to the outskirts of basic civil rights.
79. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
80. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT IV.

Intentional Infliction of Emotional Distress

81. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
82. Plaintiff was imprisoned by CHICAGO-KENT COLLEGE OF LAW professors working in fraudulent concert and thus was deprived of free will because (1) Plaintiff was penalized for not participating in school activities and for speaking out against fraudulent acts and, (2) as many in the school were aware of Plaintiff's political activities and history, Plaintiff was penalized

whenever she would express viewpoints that went against any of the professors' viewpoints. Because of Plaintiff's unique or different views, Plaintiff was forced to be relegated to the outskirts of basic civil rights.

83. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

84. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT V.

Fraudulent Misrepresentation

85. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.

86. Defendant CHICAGO-KENT COLLEGE OF LAW had two or more professors work in fraudulent concert to damage Plaintiff's reputation, esteem, and law school grade point average.

87. Plaintiff and others relied on Defendant's misrepresentations to get an additional advantage upon graduation.

88. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.

89. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues so triable pursuant to FRCP 38(b)(1) and 38(c).

PRAYER FOR RELIEF

The Plaintiff, GRACE AKINLEMIBOLA, respectfully requests that the Court enter a judgment in her favor and against the Defendants as outlined below. For

Plaintiff's pain, emotional and mental suffering, infringed constitutional rights, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,000,000,000 (\$1 billion dollars) as follows:

- a. Awarding compensatory damages,
- b. Awarding punitive damages,
- c. Awarding the costs of court and trial expenses, and
- d. Awarding such other and further relief as the Court determines just and proper.

Dated this 13th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

PRELIMINARY STATEMENT

1. Plaintiff, GRACE AKINLEMIBOLA, files this lawsuit as the fifth of a total of five separate lawsuits filed on this same day,¹⁴ where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. This lawsuit herein pertains to the acts directly initiated by ORANGE LAKE HOLDINGS LLP, who has engaged in conspicuous fraudulent acts, including selling her one of Defendant's timeshares based on fraudulent statements, fraudulently reducing the value of her timeshare and attempting to coerce Plaintiff into forfeiting her timeshare. Defendant works in concert with Defendant's subsidiary companies. All companies that have committed the fraudulent acts are all different subsidiaries owned by Defendant and controlled by Defendant. Consequently, many creditors were unwilling to finance Plaintiff's business, where Plaintiff's business made over \$3 million dollars in its first fiscal year of only 10 and a half months and is worth slightly over \$1 billion dollars.
3. While Plaintiff would have preferred to negotiate a solution with Defendant and even would have been willing to pay for any past due amount after assurance that she would not be penalized by their reduction of her timeshare's value on her credit report, the fact that (1) she was never offered an explanation as to the removal of her timeshare's value, (2) the removal occurred without her permission and without notice, and (3) she was aggressively threatened with a foreclosure allows Plaintiff to understand that Defendant never had any intention of staying upright.
4. Plaintiff seeks justice in the form of equitable relief and compensatory relief in the form of compensatory and punitive damages.

¹⁴ *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et. al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

5. Plaintiff accordingly brings this action to not only protect herself and her value, but to also seek justice.

PARTIES

6. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
7. Defendant ORANGE LAKE HOLDINGS LLP is a holding company incorporated in Delaware. Plaintiff is unaware of Defendant's headquarters and "nerve center" as defined by the Supreme Court in *Hertz Corp. v. Friend*, 555 U.S. 77 (2010), yet Defendant's executive team and chief officers are located in Kissimee, Florida.

JURISDICTION AND VENUE

8. This Court jurisdiction pursuant to 28 U.S.C. §1332.
9. Both Plaintiff and Defendant are diverse in citizenship. Plaintiff is a citizen of Illinois while Defendant is a citizen of Delaware and Florida.
10. The amount in controversy exceeds \$75,000.
11. Venue is proper in the Northern District of Illinois.

FACTUAL BACKGROUND

INTRODUCTION

12. Plaintiff seeks remedies for the consequences derived from Defendant's fraudulent acts. All companies that have committed the fraudulent acts are all owned by Defendant and controlled by Defendant. All of Defendant's subsidiaries that committed the fraudulent acts all perform related services to implement their objective of selling and maintaining timeshares where one or even two subsidiary companies could be combined to achieve the same objective. While the services are related enough for a streamlining of services, Defendant has a different subsidiary for each activity in the "assembly line," where each company/activity is then given the permission to engage in fraudulent acts: one subsidiary to solicit individuals to purchase a timeshare, another subsidiary to sell the timeshare to individuals, another subsidiary to finance an individual's purchase of a timeshare, another subsidiary to maintain the timeshares, and yet another subsidiary to collect the payments.
13. Consequently, many creditors were unwilling to finance Plaintiff's business, where Plaintiff made over \$3 million dollars in its first fiscal year of only ten and a half months and is worth slightly over \$1 billion dollars. Plaintiff amassed her first fiscal year of income based on gaining consulting contracts with many entrepreneurs and solving new ways to fix some of their problems and negotiating cumulative management strategies. Her businesses are worth a total of over \$1 billion dollars, where Plaintiff owns over 40 different brands and products.
14. While her business has accrued over \$3 million in income over the first fiscal year, her business did not have enough cash flow to sustain working capital needs. In the short term, Plaintiff was able to temporarily fix her short term cash flow issues by influencing current revenue streams to prolong their investment, yet the shortage in cash flow damaged her timeline of rolling out some of her brands and products and thus pushing the timeline back further

- which damaged some of her commitments and credibility with business opportunities that had been negotiated and further renegotiated.
15. Plaintiff started her business in February of 2016. Prior to November 1, 2016, Plaintiff was juggling her affiliation as Chief Executive Officer of her business with her former duties as Deputy Director of Strategic Affairs in the Mayor's Office in the City of Chicago. After publicly disclosing her business on statements of interest almost immediately after starting the business, her business had later grown to the point that it drew attention from the Chief of Staff in the Mayor's Office over seven months later and, after approximately three weeks of negotiation, Plaintiff was forced to make a decision to dissolve her business, sell her business, or resign from the Mayor's Office due to an ethics judgment. Plaintiff was given until October 31, 2016 to notify the Chief of Staff of her decision. On October 31, 2016, Plaintiff refused to lose the business that she had started with nothing and she refused to resign as she felt her obligations were not complete. Plaintiff was thus terminated from the Mayor's Office on October 31, 2016. If Plaintiff had the amount of financing she would have needed for her business earlier on, her business would have grown to the point where she could allow a third party to manage and control the business affairs and she could have still remained, at least in those given circumstances, with the City of Chicago.
 16. Plaintiff seeks compensatory and punitive damages for the fraudulent acts performed by Defendant and equitable relief in the form of having any reporting of nonpayment of the timeshare removed from her credit report.

POINT OF SALE

17. The fraudulent acts begin at the point of sale. Plaintiff participated in Defendant's promotional offer for a consecutive night vacation in Las Vegas, Nevada from June 28, 2014 to July 1, 2014, where Plaintiff traveled alone to celebrate her birthday in a city she never had the chance to explore previously. Participants were able to stay in one of Defendant's timeshares for a very low cost. Participants were required to attend a half-day presentation by the

- company on June 30, 2014, where participants will then be reimbursed for the amount paid for their lodging.
18. At the time of the vacation, Plaintiff was in law school, where she graduated law school in 2015 and started her company in February of 2016.
 19. It was during this presentation on June 30, 2014 that Plaintiff ultimately purchased a timeshare from Defendant after Defendant paired Plaintiff with a Real Estate Sales Broker from Defendant's company named Robert Cloutier who gave Plaintiff a tour and conducted negotiations with Plaintiff. Both Plaintiff and Defendant negotiated for Plaintiff to receive an initial 83,000 points with an additional 100,000 points on January 1, 2015 thus bringing Plaintiff to a total of 183,000 points by January 1, 2015 and if a portion of the points were not used by April of 2016, her points will expire. Plaintiff was explicitly told that the value of her timeshare was over \$40,000.

TIMESHARE MAINTENANCE

20. The fraudulent acts continued with the maintenance of her timeshare. Prior to January 1, 2016, Defendant removed a large portion of Plaintiff's points from her account. No one asked Plaintiff's permission to remove Plaintiff's timeshare value prior to the removal. No one reached out to Plaintiff to inform her of a dire change in circumstances that would require acquiring back points in various timeshare owners' accounts or even to simply discuss with Plaintiff of the removal of her points after the points were removed. The remaining points in Plaintiff's account are not enough for Plaintiff to travel accordingly.
21. Plaintiff previously called Defendant upset at the removal of points, especially if Defendant expected Plaintiff to continue paying the mortgage on the timeshare she bought. Plaintiff called for Defendant to restore her points back as she did not want to continue paying for something she was not receiving the value.
22. For several months, Plaintiff made the payments for her timeshare even after Defendant had fraudulently reduced the value of her timeshare.

23. Thus, Plaintiff was never offered an explanation as to the removal of her timeshare's value. Furthermore, the removal of Plaintiff's timeshare value occurred without her permission and without notice.

CONSEQUENCES

24. Plaintiff had started a business in February of 2016 that had gained success. Plaintiff was forced to self-finance and reinvest corporation profits in order to finance the business. She was unable to get a creditor who wanted to invest in her business due to Defendant listing her timeshare as being in foreclosure after Plaintiff stopped making payments on her timeshare property *even after* Plaintiff had made several payments after Defendant had fraudulently reduced Plaintiff's timeshare without explanation or restoration.
25. Consequently, many creditors were unwilling to finance Plaintiff's business, where Plaintiff's business made over \$3 million dollars in its first fiscal year of only 10 and a half months and is worth slightly over \$1 billion dollars.
26. In an effort to cleanse and update her credit report, Plaintiff began the process of contacting creditors on her credit report. In the same vein, she reached out to Defendant on December 20, 2016 to negotiate a solution to the current predicament of not having the value for a timeshare that she was expected to make payments for, reiterating that she had made several payments on the property even after the value had been fraudulently removed.
27. Plaintiff was met with insolence instead of a solution. When Plaintiff reached out to Defendant on December 20, 2016, Plaintiff spoke with a representative named Tasha from Defendant's Owner's Support Department who told her that her points expired in April of 2016. This same representative also had no explanation for why her points were removed from her account and transferred her to the Billing Capital Management Department. Plaintiff then later spoke to a supervisor named Zach who aggressively got back on the phone to tell Plaintiff that she needed to pay any past due amounts on the mortgage. Plaintiff responded she should not – in equality – pay for a timeshare that is not worth anything based solely on fraudulent acts from his own company. Zach then aggressively and rudely threatened Plaintiff that she

will have to “deal with” a foreclosure on her timeshare then and did not listen to any of Plaintiff’s requests. Plaintiff had specifically told relevant representatives that she did not want to pursue any type of legal action. In fact, she would be willing to negotiate everything because she simply wanted the foreclosure and any negative commitments associated with it removed from her credit report.

28. Thus, Plaintiff was aggressively threatened with a foreclosure.

29. A week later, Plaintiff was informed that Defendant followed through on his threat and had begun the process of filing a foreclosure action against her timeshare in an effort to force Plaintiff to sell the remainder value of her timeshare and “cover up” any errors, miscalculations, or fraudulent communications.

30. Plaintiff accordingly brings this action to not only protect herself and her property, but to also seek justice.

COMPLAINTS AGAINST DEFENDANT

COUNT I.

Common Law Fraud

31. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
32. On June 30, 2014, Plaintiff was intentionally informed of misleading information during negotiations to purchase the timeshare, where Plaintiff was told the value of her timeshare was worth over \$40,000.
33. Plaintiff bought the timeshare based solely on the high value of the timeshare.
34. Plaintiff had an initial 83,000 points as of June 30, 2014 and an additional 100,000 points as of January 1, 2015.
35. Defendant marketed the total 183,000 points to be worth a value of over \$40,000.
36. Prior to January 1, 2016, the value of Plaintiff's timeshare was intentionally reduced by Defendant without Plaintiff's permission and without notice.
37. Understanding that Plaintiff wanted to get the value of her timeshare restored, Defendants have now forced Plaintiff's timeshare into foreclosure and demanded payment without restoring the value.
38. Defendants have threatened Plaintiff with a forced sell of the timeshare if Plaintiff does not pay for a sham timeshare within sixty days.
39. As a direct result of the Defendants' promise, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and missed opportunities in cash flows for Plaintiff's business.
40. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendant and equitable relief in the form of having any reporting of nonpayment of the timeshare removed from her credit report.

COUNT II.

Fraudulent Misrepresentation

41. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
42. As a direct result of the Defendants' promise, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and missed opportunities in cash flows for Plaintiff's business.
43. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendant and equitable relief in the form of having any reporting of nonpayment of the timeshare removed from her credit report.

COUNT III.

Fraudulent Conversion

44. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
45. Defendant has removed the value of Plaintiff's timeshare.
46. As a direct result of the Defendants' promise, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and missed opportunities in cash flows for Plaintiff's business.
47. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendant and equitable relief in the form of having any reporting of nonpayment of the timeshare removed from her credit report.

COUNT IV.

Trespass to Chattels

48. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
49. As a direct result of the Defendants' promise, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and missed opportunities in cash flows for Plaintiff's business.
50. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendant and equitable relief in the form of having any reporting of nonpayment of the timeshare removed from her credit report.

PRAYER FOR RELIEF

The Plaintiff, GRACE AKINLEMIBOLA, respectfully requests that the Court enter a judgment in her favor and against the Defendants as outlined below. For Plaintiff's pain, emotional and mental suffering, infringed constitutional rights, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,000,000,000 (\$1 billion dollars) as follows:

- a. Awarding compensatory damages,
- b. Awarding punitive damages,
- c. Awarding the costs of court and trial expenses, and
- d. Awarding such other and further relief as the Court determines just and proper.

Dated this 13th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

PRELIMINARY STATEMENT

1. Plaintiff, GRACE AKINLEMIBOLA, files this lawsuit as the sixth of a total of six separate lawsuits filed,¹⁵ where each lawsuit surrounds corrupt acts within the state of Illinois, state agencies, state actors, municipal actors, or other institutions impacting these same agencies and actors.
2. Plaintiff GRACE AKINLEMIBOLA files this lawsuit surrounding the acts of City of Chicago police officers, where the officers harassed an employee of her company. This lawsuit herein pertains to the acts directly initiated by the CHICAGO POLICE DEPARTMENT and CITY OF CHICAGO.
3. Plaintiff GRACE AKINLEMIBOLA founded The Grace Akinlemibola Corporation in February of 2016, where her company owns subsidiary companies which include Grakin Corporation. Grakin Corporation provides financial consulting, legal consulting, strategic consulting, and all-around business consulting, where GRACE AKINLEMIBOLA – a law school and business school graduate – serves as the President of Grakin Corporation.
4. On January 13, 2017, Plaintiff GRACE AKINLEMIBOLA filed 5 separate lawsuits surrounding corrupt acts in and beyond the city of Chicago and the state of Illinois. Plaintiff, a former employee of City of Chicago Mayor Rahm Emanuel, filed these 5 lawsuits against Rahm Emanuel, City of Chicago, State of Illinois, and the Illinois Supreme Court amongst other parties. Plaintiff then posted about all of these “anti-corruption” lawsuits online almost immediately upon filing the complaints.
5. On Saturday, January 14, the day after filing her lawsuits in federal court, one of Plaintiff’s employees, HILTON WRIGHT, who was formerly homeless prior to accepting a job with Plaintiff GRACE AKINLEMIBOLA’s company, was unduly harassed by 4 white male Chicago policemen, where Plaintiff HILTON

¹⁵ *Grace Akinlemibola v. Chicago Public Schools, Rahm Emanuel et. al.*
Grace Akinlemibola v. City of Chicago, Michael Rendina et al.
Grace Akinlemibola v. State of Illinois, Bruce Rauner et al.
Grace Akinlemibola v. Chicago-Kent College of Law, Carolyn Shapiro
Grace Akinlemibola v. Orange Lake Holdings LLP
Grace Akinlemibola, Hilton Wright v. Chicago Police Department, City of Chicago

- WRIGHT was called a “nigger” and locked in a jail cell where police did not allow him to use the bathroom and he ultimately urinated in the cell.
6. For disturbing Plaintiff GRACE AKINLEMIBOLA’s company and Plaintiff HILTON WRIGHT’s liberty and self-worth, the Plaintiffs seek justice from the City of Chicago and City of Chicago Police Department.
 7. Plaintiffs accordingly brings this action.

PARTIES

8. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
9. Plaintiff, GRACE AKINLEMIBOLA, is an individual residing and domiciled in Chicago, Illinois.
10. Defendant CITY POLICE DEPARTMENT is an administrative body in the city of Chicago.
11. Defendant CITY OF CHICAGO is an administrative body in the city of Chicago.

JURISDICTION AND VENUE

12. In addition to state law claims, Plaintiff also brings this action as a violation of rights secured by the Constitution of the United States of America pursuant to 42 U.S.C. §1983.
13. This Court has federal question jurisdiction pursuant to 28 U.S.C. §1331.
14. Venue is proper in the Northern District of Illinois under 28 U.S.C. §1391(b)(1) as all defendants reside in the northern judicial district of Illinois. Venue is also proper in this court under 28 U.S.C. §1391(b)(2) because a substantial part of the events or omissions giving rise to the subject claims arose in the city of Chicago.

FACTUAL BACKGROUND

15. Plaintiff seeks remedies for the consequences derived from Defendants' corrupt acts.
16. Plaintiff GRACE AKINLEMIBOLA founded The Grace Akinlemibola Corporation in February of 2016, where her company owns subsidiary companies which include Grakin Corporation. Grakin Corporation provides financial consulting, legal consulting, strategic consulting, and all-around business consulting, where GRACE AKINLEMIBOLA – a law school and business school graduate – serves as the President of Grakin Corporation.
17. Plaintiff GRACE AKINLEMIBOLA first met Plaintiff HILTON WRIGHT close to two years ago while HILTON WRIGHT was homeless.
18. GRACE AKINLEMIBOLA had started to provide spiritual counseling for the homeless, where HILTON WRIGHT was one of the individuals she had provided spiritual counseling for regularly.
19. GRACE AKINLEMIBOLA had told HILTON WRIGHT about her intentions of starting a temporary homeless shelter called House of Grace, where homeless individuals will be able to stay for no less than six months and House of Grace will provide mentoring, spiritual counseling, housing assistance, and life skills for a total period of one year.
20. As GRACE AKINLEMIBOLA's company intended to open the House of Grace in 2016 but was delayed in the opening due to the acts as outlined in the separate lawsuits, HILTON WRIGHT was unable to be a member of the first class of the House of Grace prior to the winter of 2016.
21. In early December of 2016, GRACE AKINLEMIBOLA offered HILTON WRIGHT a place to stay in a guest room of her home until the House of Grace begins.
22. GRACE AKINLEMIBOLA also offered HILTON WRIGHT a position as an assistant in her company, where GRACE AKINLEMIBOLA would be able to provide professional development and further finance his educational

- credentials so he can ultimately move to a different position within the company.
23. HILTON WRIGHT is a part-time employee and gets paid \$11 per hour with GRACE AKINLEMIBOLA's company.
 24. On January 13, 2017, Plaintiff GRACE AKINLEMIBOLA filed 5 separate lawsuits surrounding corrupt acts in and beyond the city of Chicago and the state of Illinois. Plaintiff, a former employee of City of Chicago Mayor Rahm Emanuel, filed these 5 lawsuits against Rahm Emanuel, City of Chicago, State of Illinois, and the Illinois Supreme Court amongst other parties. Plaintiff then posted about all of these "anti-corruption" lawsuits online almost immediately upon filing the complaints.
 25. The day after filing her lawsuits in federal court, HILTON WRIGHT was grabbed by four white male police officers on the intersection of State Street and Lake Street.
 26. The police officers accused HILTON WRIGHT of panhandling before forcing HILTON WRIGHT to be searched and arrested by the police officers.
 27. During HILTON WRIGHT's arrest, police officers called him a "nigger" and, although HILTON WRIGHT has never met any of the police officers before that day, the four white male police officers ridiculed HILTON WRIGHT for being uneducated.
 28. HILTON WRIGHT never graduated from high school.
 29. HILTON WRIGHT was taken to the First District Police Station, where he was placed in a jail cell. HILTON WRIGHT asked to use the bathroom and was denied by officers.
 30. HILTON WRIGHT was forced to urinate in his jail cell.
 31. Police officers released HILTON WRIGHT late that evening.
 32. For disturbing Plaintiff GRACE AKINLEMIBOLA's company and Plaintiff HILTON WRIGHT's liberty and self-worth, the Plaintiffs seek justice from the City of Chicago and City of Chicago Police Department.
 33. Plaintiff HILTON WRIGHT brings this action for a total of \$8 million in damages.

34. Plaintiff GRACE AKINLEMIBOLA brings this action for a total of \$1.5 million in damages.

COMPLAINTS AGAINST DEFENDANTS

COUNT I.

(Both Plaintiffs)

§1983 Violation of Due Process

35. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
36. Defendant's actions forced HILTON WRIGHT to be restrained of his movements except by the police officer's will, where the police officers did not have cause to detain HILTON WRIGHT.
37. Defendant's acts interfered with GRACE AKINLEMIBOLA's company, which GRACE AKINLEMIBOLA owns 100% of the shares of the company.
38. As a direct result of the Defendants' acts, the Plaintiffs have sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
39. In order to be made whole, Plaintiffs respectfully request compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT II.

(HILTON WRIGHT's claim)

§1983 Violation of the Fourth Amendment

40. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
41. Plaintiff HILTON WRIGHT was illegally stopped, frisked, and detained by Chicago police officers.
42. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
43. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT III.

(HILTON WRIGHT's claim)

§1983 Violation of Equal Protection

44. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
45. Plaintiff HILTON WRIGHT was denied his fundamental right to liberty and right to due process based on his race.
46. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
47. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT IV.

(HILTON WRIGHT's claim)

False Imprisonment

48. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
49. Defendant's actions forced HILTON WRIGHT to be restrained of his movements except by the police officer's will, where the police officers did not have cause to detain HILTON WRIGHT.
50. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
51. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants

COUNT V.

(Both Plaintiffs)

Common Law Fraud

52. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
53. Defendants have conspired to interfere with GRACE AKINLEMIBOLA's company.
54. Defendants confronted HILTON WRIGHT with an allegation based on GRACE AKINLEMIBOLA's pursuit of justice against public institutions and public officials.
55. As a direct result of the Defendants' acts, the Plaintiffs have sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
56. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT VI.

(GRACE AKINLEMIBOLA's claim)

Tortious Interference with a Business Relationship

57. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
58. Defendant's acts interfered with GRACE AKINLEMIBOLA's company, which GRACE AKINLEMIBOLA owns 100% of the shares of the company, and where HILTON WRIGHT was an employee.
59. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
60. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

COUNT VIII.

(HILTON WRIGHT's claim)

Intentional Infliction of Emotional Distress

61. Plaintiff reasserts and incorporates by reference the allegations contained in the preceding paragraphs as if fully set forth herein.
62. As a direct result of the Defendants' acts, the Plaintiff has sustained emotional injuries, economic injuries, reputational injuries, and opportunity costs.
63. In order to be made whole, Plaintiff respectfully requests compensatory and punitive damages for the fraudulent acts performed by Defendants.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues so triable pursuant to FRCP 38(b)(1) and 38(c).

PRAYER FOR RELIEF

The Plaintiffs respectfully request that the Court enter a judgment in their favor and against the Defendants as outlined below.

For Plaintiff HILTON WRIGHT's pain, emotional and mental suffering, infringed constitutional rights, economic damages, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$8,000,000 (\$8 million dollars) as follows:

- a. Awarding injunctive relief in ceasing any penalties related to the previous encounter from HILTON WRIGHT's record,
- b. Awarding compensatory damages,
- c. Awarding punitive damages,
- d. Awarding the costs of court and trial expenses, and
- e. Awarding such other and further relief as the Court determines just and proper.

For Plaintiff GRACE AKINLEMIBOLA's emotional and mental suffering, infringed constitutional rights, economic damages, and other damages as previously mentioned, Plaintiff is requesting a total amount of \$1,500,000 (\$1.5 million dollars) as follows:

- f. Awarding compensatory damages,
- g. Awarding punitive damages,
- h. Awarding the costs of court and trial expenses, and
- i. Awarding such other and further relief as the Court determines just and proper.

Dated this 20th day of January, 2017.

Respectfully submitted,

By: GRACE AKINLEMIBOLA

Pro Se

HILTON WRIGHT

EPILOGUE

I stared down at the completed, signed, and stamped legal complaints that were now in court. The sixth case was filed days after the initial five lawsuits. I filed the five cases in court on a Friday, posted about it online, and one of my employees, who was formerly homeless, was harassed by four white male Chicago policemen the next day, on Saturday, calling him all types of “niggers” and taking him into custody where they would not even let him use the bathroom and he pissed inside of his jail cell.

I would not typically assume that such acts would have anything to do with the fact that I filed five lawsuits just the prior day in federal court, but there was something that stood out about this issue: the fact that he was the only employee who also resides in my home.

And before you ask, let me answer all of the questions I had to make sure I went through with my family whenever they would come visit me and look at me with confusion to see a man living in my home. No, I am not dating him. No, I have never slept with him and neither do I intend to. And no, I do not see him as a romantic potential. Hilton had become more of a brother to me and, at the time, I had someone else in mind, so I really was not checking for Hilton.

I had first met him a little less than two years ago when I had started praying for the homeless and I would see him on the same corners. There were many times when those I would pray for would shoo me away and tell me they would simply prefer money instead of my prayers, so I would move along. But my employee, Hilton, was always open – and even encouraging me – to pray for him whenever I passed him. I would stop and have conversations with many of the folks I prayed for, so Hilton had already knew that I

had intended to start House of Grace. House of Grace was going to be one of my subsidiaries, except it would operate as a temporary homeless shelter, where it would be “a home for the homeless.” The entire structure would entail providing employment assistance, spiritual guidance and counseling, housing assistance, and much more over the span of one year with three different stages. Every person who would want to stay in the House of Grace would have to be committed to wanting to be spiritually “saved” by Jesus Christ; however, if they did not want to, we would have reciprocal relationships with other homeless shelters that would be able to provide temporary shelter for them. The entire point of House of Grace was to transform their lives, to bring self-worth into their outlooks, to set them on a path of personal development with love, kindness, and self-respect.

I had intended to open House of Grace before the winter, but as outlined in one of my lawsuits, cash flow issues pushed back our timeline for rolling out some of our brands. Thus, one of the cold winter mornings as I was walking to my office building found me passing Hilton on the corner on State Street.

“Hey, Hilton,” I had said with a smile after he had waved me over.

“Hey,” he replied back and held out his hands as was customary because he already knew that I was about to pray for him.

I prayed quickly and then shivered. It was really one of the coldest days out. I was shivering in my jacket, so I could only imagine what Hilton felt.

“Where are you sleeping at night?” I had asked him.

Hilton pointed to the Macy’s on that corner. “Right between that alley over there behind Macy’s. Haven’t been bothered,” he replied. “What about that shelter you were starting? Have you done it yet?”

I grimaced. “No, we ended up having to push it back a bit,” I replied as I had tapped my foot awkwardly on the pavement and a wave of self-loathing came over me.

I had continued conversation briefly and then walked to my office. Throughout the day, it had bothered me that he was still out on the corner as cold as it was and sleeping outside at night.

The next morning, I felt compelled to offer the guest bedroom in my home to Hilton. I had looked for him that morning but he was not on his regular corner that was on my way to work. Later that day, it began to snow and before I went home, I searched through the alley behind Macy’s. I still could not find Hilton. I spent the next three or four days trying to find Hilton whenever I would drive on my way back home to offer him a place to stay.

I finally found him the next week as I was walking on my way to work and he was standing inside of the Walgreen’s on the corner of State of Randolph Street.

“Hilton!” I exclaimed loudly and with relief. I had started to have strange thoughts of him freezing to death as we had a huge blizzard the week before.

“Hey Grace,” he replied back with a smile.

“So are you sleeping somewhere at night now? I tried looking for you the past few days and haven’t seen you,” I had said.

“I was out in South Chicago for a while, but I’m back now,” he had said.

“Okay, well, I was looking for an Assistant in my business and it would be great if you can fill the role. And I haven’t started the shelter yet, but I was thinking you could stay at my place. I have an extra guest room and once we start the shelter, you can move there or your own place now that you have a job. Or wherever,” I had said nonchalantly.

“For real,” Hilton had said with a laugh. “Um, sure,” he had said before I had him follow me to my office.

The rest is history.

Now, I simply look forward to the relief. Based on the fact that my company accepts payment arrangements for services even after services are rendered, my company had struggled a while back with cash flows. When I then tried to seek financing for the business, every single lender turned me down for financing that would have been substantial enough to do all of the things that we were seeking to do by this point.

And I have spoken to or dealt with over 100 different lenders or brokers.

I go through details with many of them: the highs, the lows, the bank statements and cash flows, the financial statements, the explanation of discrepancies, and more. Many of them seem to stare down at me, unwilling to accept the credibility of an African-American female-owned business. Others begin to ignore me when I tell them about our financial statements. “Uh huh” is the response they usually provide with a negligent and dismissive tone before they return to their prior dealings.

Many of them do not even want to hear about our worth, our brands, the companies.

And did I forget to mention that I am currently in the middle of these lawsuits now in federal court?

So now, as I type away at the keyboard in my office, my mind – as is typical in my everyday life – is simultaneously wandering to the nineteen other items on my to-do list that need to be done within the next two days that have yet to be touched along with the additional four items that have to be added.

My mind then subsequently travels to contingency plans for handling the cash flow issues in case the other four plans that I currently have – which are also on my to-do list – do not work out. I then think about how I have “informally” removed myself from payroll since right before Christmas of last year.

Christmas.

I tried to swallow back the low self-esteem that threatened me at that moment. I usually would go and visit my parents in Indiana for Thanksgiving and Christmas, where all of my family members would get together at my parent’s house at that time. Oftentimes, it would be the only times I would see my sisters, nephews, and niece throughout the year.

This year, I worked through both holidays and tried to ignore my phone blowing up with phone calls from my parents, sisters, or concerned family friends.

They all hate me. I think I can say that with self-assurance right now.

Oh, and my dog hates me now. I have not taken my dog, a Doberman named Bruce, to the park in months now, although I always let him out every day to play in the yard at home. He now tears up my living room furniture. Every day when I am leaving, Bruce runs to the window and watches me gently as if he were the world’s sweetest dog. The moment my car is out of sight, he completely ruins everything – including my hardwood floors.

I block out the guilt, the shame, the disappointments, the grief, the pain. Instead, I focus on the question I asked myself ten years ago.

Where do I see myself in 10 years?

I did not hesitate as I thought about my response this time around.

Happy.