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6 Attorneys for Plaintiffs  
The People of the State of California, and  
7 The People of the United States of America

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9  
10 IN THE UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO

13  
14  
15 People of the United States of  
America and the State of California,  
16 Plaintiffs,  
17 vs.  
18 Donald Trump; United States of  
America,  
19 Defendants.  
20

Case Number: 3:17-cv-451

APPLICATION TO PROCEED IN  
FORMA PAUPARIS

21 TO THE COURT:

22 Plaintiffs are the People of the United States of America and the State of  
23 California. No one particular individual is named as a plaintiff in the action. It is my  
24 understanding, belief, and opinion that the Court may only look to the assets which  
25 belong to the People with regard to an application for waiver of Court Filing Fees and  
26 Costs. Accordingly, it is my understanding and belief that the sole asset of the People  
27 consists of Federal Taxes paid by the People to the United States Government. Since  
28 taxes are federal funds, it is my understanding, belief and opinion that there are no

1 separate and independent assets of the People of the United States and the State of  
2 California (generally “the People), and therefore I believe this Application should be  
3 granted on this basis.

4 As a second basis, the Federal Courts have posted the following on the internet:  
5

6 Effective on: December 1, 2016

7 The United States should not be charged fees under this schedule, with  
8 the exception of those specifically prescribed in Items 2, 4 and 5, when  
the information requested is available through remote electronic access.

9 The posting is found at:

10 [http://www.uscourts.gov/services-forms/fees/district-court-miscellane  
11 ous-fee-schedule](http://www.uscourts.gov/services-forms/fees/district-court-miscellaneous-fee-schedule)

12 It is my understanding, belief and opinion that an action brought on behalf of the  
13 People of the United States is an action brought on behalf of “the United States.”  
14 Based on this understanding, belief and opinion, I do not believe that any Court filing  
15 fees or costs can or should be charged in relation to this Action. In the alternative,  
16 because there is not one particular individual plaintiff from which costs may be  
17 collected and charged, I respectfully request the granting of this application as it  
18 would not be fair or proper to require the representing law firm itself to pay the costs.  
19

20 I declare under penalty of perjury that the foregoing is true and correct and  
21 within my personal knowledge, and where opinions are specified, said opinions are  
22 within my best judgment. The matters expressed above are based on my best  
23 understanding, belief, and opinion.  
24

25 Executed January 30, 2017 in El Cerrito,           s/Andrew W. Shalaby            
26 CA Andrew W. Shalaby