

No. 25-6383

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IN THE SUPREME COURT OF THE  
UNITED STATES OF AMERICA

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WILSON OCHAR, *Plaintiff-Petitioner*,

v.

Lentegrity LLC et al Merlex Auto Group.  
*Defendants-Respondents.*

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On Appeal from the United States Court of  
Appeals for the Fourth Circuit Case No.  
25-1327.

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PLAINTIFF'S MOTION FOR  
RECONSIDERATION OF DENIAL OF IN FORMA  
PAUPERIS

February 28th 2026  
Wilson Ochar  
Pro Se Party  
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a. **MOTION FOR RECONSIDERATION OF DENIAL OF IN FORMA PAUPERIS**

1. HERE COMES NOW, the plaintiff Wilson Ochar, appearing pro se, respectfully moves this Honorable Court, pursuant to Supreme Court Rule 39 (proceedings in forma pauperis) and Supreme Court Rule 21 (motions to the Court), for reconsideration of the Court's Order dated February 23, 2026, denying without prejudice his Motion to Proceed In Forma Pauperis and requiring payment of the docketing fee by March 16, 2026.
2. This reconsideration and amended ifp motion provides the detailed statement of business expenses requested by analogous federal standards, attaches supporting documentation (2024 Joint Tax Return Schedule C and 2025 Joint Bank Statements), and renews the request for IFP status. In support, Petitioner states as follows:

b. **AFFIDAVIT OF INDIGENCY**

3. I, Wilson Ochar, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I am unable to pay the docketing fee or other costs associated with this proceeding without depriving myself and my family of the necessities of life, including food, shelter, utilities, and basic medical care.
4. I am currently receiving public assistance through the Supplemental Nutrition Assistance Program (SNAP), Account ID: 2127528207. My household is entirely dependent on this assistance for basic nutritional needs.
5. I am presently unemployed following a wrongful termination from my position at George Mason University (see Wilson Ochar v. Employment Enterprises Inc., et al George Mason University at Fairfax County Circuit Court No. CL-2025-0015517, currently pending).
6. Prior annual self-employed income was approximately \$100,000 (2024 tax year), but this has ceased, and I have no current wages, salary, or other regular income beyond SNAP.
7. I have minimal assets: no real property, no significant savings, no investments, no retirement accounts, and

no other liquid resources sufficient to pay the \$350 docketing fee plus printing/ mailing costs without causing immediate hardship.

8. I support a family, including dependents, and ongoing litigation in multiple venues (state and federal) has further depleted any limited resources I previously had.
9. My current monthly expenses exceed any available resources, and payment of the docketing fee would force me to forgo basic necessities.

c. **DETAILED STATEMENT OF BUSINESS EXPENSES**

10. In response to standards analogous to federal IFP requirements (28 U.S.C. § 1915(a)(1)), the petitioner attached his 2024 Joint Tax Return (Form 1040 and Schedules C) as Exhibit A.
11. This return details expenses for three self-employed businesses operated in 2024, totaling \$11,743 in net profit after \$59,287 in gross receipts and \$47,544 in total expenses (including deductions).
12. These businesses were closed in 2025 upon getting employment which was wrongfully terminated, thus contributing to the petitioner's current unemployment and reliance on SNAP. Breakdowns are as follows:
  - a. ***Business 1 (Gross Receipts: \$10,850; Net Profit: \$1,610 after \$8,740 expenses and \$500 home office deduction):***
    - i. \$7,250 rent;
    - ii. \$250 advertising;
    - iii. \$100 office supplies;
    - iv. \$840 utilities;
    - v. \$300 miscellaneous.
    - vi. Profit: \$2,110 less \$500 deduction = \$1,610.
  - b. ***Business 2 (Gross Receipts: \$14,300; Net Profit: \$4,735 after \$9,440 expenses and \$125 home office deduction):***
    - i. \$7,250 rent (portion);
    - ii. \$650 advertising;
    - iii. \$700 office supplies;
    - iv. \$840 utilities.
    - v. Profit: \$4,860 less \$125 deduction = \$4,735.

- c. **Business 3 (Gross Receipts: \$34,350; Net Profit: \$5,398 after \$22,127 expenses and \$125 home office deduction):**
- i. \$15,812 vehicle standard deduction;
  - ii. \$3,000 advertising;
  - iii. \$600 office expense;
  - iv. \$1,500 office supplies;
  - v. \$375 deductible meals;
  - vi. \$840 utilities.
  - vii. Profit: \$5,523 less \$125 deduction = \$5,398.
- d. **Total net business profit:** \$1,610 + \$4,735 + \$5,398 = \$11,743. This was used for home expenses (maintenance, food, clothing, laundry, medical, transportation, insurance, emergencies).
- e. **Not all receivables were collected;** Actual 2024 earnings fell short of estimates. Wife's \$57,121 W-2 income covered daycare, household items, gas, personal needs; Petitioner borrowed from her during emergencies, indirectly depleting her funds for family use.
- f. **Attached as Exhibit B are 2025 Joint Bank Statements, showing low/negative ending balances:**
- i. January (-\$25),
  - ii. February (\$53),
  - iii. March (-\$85),
  - iv. April (\$7),
  - v. May (-\$81),
  - vi. June (-\$13),
  - vii. July (\$13),
  - viii. August (\$0.01),
  - ix. September (\$26),
  - x. October (\$705),
  - xi. November (-\$3),
  - xii. December (\$0.98).
  - xiii. This proves expenses exceed income, confirming indigency. These records prove that the petitioner lives in a state of constant financial volatility:
- g. **Negative or Near-Zero Balances:** The account ended in the negative or under \$30 in eight out of twelve months (e.g., Jan: -\$25; Nov: -\$3).

- h. **Liquidity Crisis:** The highest balance (Oct: \$705) was immediately depleted by recurring necessities. There are no liquid assets available to pay the \$350 docketing fee plus printing/ mailing costs without depriving the family of food or shelter.

**d. LEGAL ARGUMENT FOR RECONSIDERATION AND RENEWAL**

**13. Indigency and Public Assistance Presumption:**

Under Supreme Court Rule 39.1 and 28 U.S.C. § 1915(a)(1), IFP is warranted if the affidavit shows inability to pay. SNAP creates a presumption of eligibility. See *Adkins v. E.I. Du Pont de Nemours & Co.*, 335 U.S. 331, 339–40 (1948); Also see *Bruce v. Samuels*, 577 U.S. 82, 87 (2016). With detailed expenses provided, denial is an abuse of discretion. Va. Code § 8.01-384.1 supports this.

- a. **The Presumption of Indigency from SNAP Benefits:** Under Supreme Court Rule 39.1, the standard for IFP eligibility is whether a litigant can pay court fees without depriving themselves of the "necessities of life".
- b. **Means-Tested Evidence:** Participation in the Supplemental Nutrition Assistance Program (SNAP) is sufficient evidence of financial need, as SNAP eligibility requires meeting strict federal poverty guidelines.
- c. **Presumption of Eligibility:** While some states (like Virginia under Va. Code § 8.01-384.1) have codified a presumption of indigency for recipients of public assistance, this Court often uses these benefits as a functional benchmark for the Adkins "necessities of life" standard.
- d. **Legal Precedents for Broad Access:** In *Adkins v. E.I. Du Pont de Nemours & Co.* (1948): This remains the controlling authority that a petitioner need not be "absolutely destitute" to qualify for IFP status. Also see *Bruce v. Samuels* (2016): While primarily addressing prisoner installment payments under the Prison Litigation Reform Act (PLRA), this case

reaffirms that IFP statutes are intended to ensure meaningful access to the courts for indigent litigants.

- e. ***Avoidance of Fee Barriers***: The principle from Bruce and Adkins suggests that if a petitioner's only income is means-tested public assistance or unemployment, requiring a filing fee acts as a total barrier to justice, which constitutes the "manifest injustice" cited in analogous federal rules.

14. **Prior IFP Grants Confirm Eligibility**: The United States District Court for the Eastern District of Virginia previously granted IFP in related matters (e.g., Ochar v. Lentegrity et al., No. 1:24-cv-00926, ECF No. 22, entered July 12, 2024). No material change in circumstances has occurred; Petitioner's financial condition has remained the same or worsened due to unemployment and ongoing litigation. See *Attar v. DMS Tollgate LLC*, 451 F. App'x 86 (3d Cir. 2011) (consistent indigency supports continued IFP). Reversal without intervening improvement constitutes an abuse of discretion under analogous 28 U.S.C. § 1915(e). The petitioner's unchanged poverty, where the median household income for Alexandria City, VA, is around \$113,600 to \$113,638, based on recent U.S. Census Bureau data (2019-2023) and the petitioner earning 100,000\$ last year, clearly shows he is below the median income and as in *Attar*, it justifies reconsideration.

- a. ***Established Indigency***: Petitioner was granted IFP status by the U.S. District Court for the Eastern District of Virginia on July 12, 2024 (No. 1:24-cv-00926, ECF No. 22).
- b. ***The Attar Principle***: In *Attar v. DMS Tollgate LLC*, 451 Fed. App'x 86 (3d Cir. 2011), the court recognized that consistent indigency throughout a proceeding supports the continued grant of IFP status. Because the petitioner's financial situation has remained unchanged (or worsened) since that July 2024 order, a denial now constitutes a "material fact" overlooked by the Court.

- c. ***Income Context in Alexandria, VA (2026 Data)***: Petitioner's financial position must be viewed within the economic reality of his residence in Alexandria, VA.
- d. ***Median Income***: According to the most recent U.S. Census Bureau data for Alexandria City, the median household income (adjusted for inflation into 2026) is approximately \$113,638.
- e. ***Indigency Threshold***: While an income of \$100,000 may appear high in other regions, in the high-cost-of-living Northern Virginia area, this amount falls below the local median.
- f. ***The Adkins Standard***: As established in *Adkins v. E.I. Du Pont de Nemours & Co.*, petitioner does not need to be "absolutely destitute." If paying the high Court docketing fee and printing costs would deprive him of the "necessities of life" (rent, utilities, and food in a top-tier cost-of-living area), then he meets the statutory definition of indigency.
- g. ***Manifest Injustice***: A reversal of IFP status without an intervening "material change in circumstances" (such as a sudden inheritance or significant raise) is often viewed as an abuse of discretion under analogous 28 U.S.C. § 1915(e).
- h. ***Procedural Lockout***: By denying IFP despite the E.D. Va. 's prior finding of poverty, the Court is effectively "closing the courthouse doors" based on a shifting standard that the petitioner cannot meet.
- i. ***Rehearing Ground***: Petitioner asserts that the Court's denial overlooks the District Court's July 12, 2024, finding of indigence, which remains the most accurate reflection of his financial status.

**15. Ongoing Litigation Burdens Exacerbate Hardship:**

The petitioner is simultaneously litigating multiple meritorious cases arising from systemic issues (predatory lending, wrongful termination, medical malpractice, eviction), including: *Ochar v. Lentegrity et al.*, E.D. Va. No. 1:24-cv-00926 (consumer credit/redlining); *Lloyd Apartments LLC v. Ochar*,

Alexandria GDC No. GV25009517-00; Bridge WF II VA Mason Van Dorn LLC v. Ochar, Alexandria GDC No. GV26000279-00; (Facing eviction for nonpayment) Wilson Ochar v. Employment Enterprises Inc et al George Mason University Fairfax Cir. Ct. No. CL-2025-0015517 (wrongful termination). These cases drain limited resources and stem from corporate negligence and predatory practices. Denying IFP perpetuates economic barriers for pro se litigants pursuing public-interest claims. See *Neitzke v. Williams*, 490 U.S. 319, 324 (1989) (IFP protects against economic barriers to meritorious claims); Also see *Bounds v. Smith*, 430 U.S. 817, 821 (1977) (access to courts is fundamental).

- a. ***Hardship from Concurrent Litigation:*** The petitioner is currently managing multiple high-stakes cases that address systemic issues, which drains both his financial and mental resources.
- b. ***Wrongful Termination:*** Petitioner transitioned from self-employment to a staff position at George Mason University in an effort to stabilize his household income. However, he was wrongfully terminated, leading to the matter of Wilson Ochar v. Employment Enterprises Inc. (Case No. CL-2025-0015517). This termination has left the petitioner in a dire financial state, making him dependent on the Virginia Supplemental Nutrition Assistance Program (SNAP) (Account ID: 2127528207). Petitioner is proceeding pro se in the Circuit Court of Fairfax County challenging his wrongful employment termination which evidently shows his employment status.
- c. ***Consumer Disputes:*** In Ochar v. Lentegrity (No. 1:24-cv-00926), petitioner challenged predatory practices involving the Truth in Lending Act and the Code of Virginia stemming from an audit query raised from his redlining lenders who denied him an equal opportunity for a mortgage claiming the petitioner had excess obligations from the auto loan.

- d. ***Procedural Toll***: The Fourth Circuit dismissed an interlocutory appeal in the Lentegrity case on May 28, 2025, for lack of jurisdiction despite the petitioner's Motion for a Final Order being denied leaving nothing but to appeal the entire case. These procedural setbacks and the necessity of managing state and federal dockets simultaneously reinforce the argument that the petitioner lacks the discretionary income to pay high court fees while seeking basic justice for himself and his community.
- e. ***Legal Principles***: *Neitzke v. Williams* (1989): The Supreme Court held in *Neitzke v. Williams* that the In Forma Pauperis (IFP) statute (now 28 U.S.C. § 1915) is designed to ensure that indigent litigants have "practical protections against unwarranted dismissal".
- f. ***Access to Justice***: Justice Marshall noted that IFP status is intended to put indigent plaintiffs on a "similar footing with paying plaintiffs".
- g. ***Merit vs. Frivolity***: Under *Neitzke*, a complaint that merely fails to state a claim (Rule 12(b)(6)) is not automatically "frivolous" under the IFP statute. Denying a petitioner's IFP status because of the complexity or number of their filings would ignore this distinction and create an unconstitutional economic barrier to meritorious claims.
- h. ***Cumulative Impact***: Petitioner argues that while any single fee might be manageable, the cumulative cost of filing in multiple venues (Fairfax Circuit Court, E.D. Va., and the Fourth Circuit) has rendered him indigent within the meaning of the law.
- i. ***Public Concern***: Petitioner emphasizes that his cases involve constitutionalism and employment justice in Virginia, thus serving a broader public interest, making his access to the Court even more critical to the integrity of the judicial system.

16. **Response to Court's Screening**: Petition states claims. Attached as Exhibit C are disputes to CRAs

(Equifax, Experian, TransUnion), triggering FCRA duties. Lentegrity is also a debt collector and credit report furnisher; direct dispute + CRA notice suffices. FDCPA: Lentegrity uses deceptive means.

a. ***Due Diligence Regarding Credit Reporting:***

The petitioner has attached notices sent to credit bureaus investigating respondent Lentegrity's reporting. Despite the petitioner's due diligence, the bureaus continue to report false information. The petitioner argues it is a manifest injustice for the Court to assume a lack of diligence when the petitioner is actively fighting systemic corporate negligence across multiple venues.

b. **Diversity Jurisdiction vs. IFP Eligibility:**

The petitioner notes that while the amount in controversy exceeds \$75,000 (meeting 28 U.S.C. § 1332 requirements), the Court should not conflate the value of the claims with the wealth of the petitioner or lack of it. The focus remains on the respondent's multi-million dollar exploitation of consumers, while the petitioner's personal net income remains below the Alexandria median of \$113,638.

17. **Precedent for Pro Se Impacts:** The Court should not deny IFP based on a presumption that a pro se party cannot successfully litigate an issue. The petitioner cites the following examples where pro se efforts led to significant legal changes:

a. ***Haines v. Kerner, 404 U.S. 519:*** Established the "less stringent standards" for pro se pleadings. This is perhaps the most important pro se victory in U.S. history. Eli Haines, an inmate, sued prison officials for damages after being put in solitary confinement. The Supreme Court ruled in his favor, stating that pro se complaints should not be dismissed unless it appears "beyond doubt that the plaintiff can prove no set of facts in support of his claim." This created a "shield" for millions of future self-represented litigants.

- b. *Bonavito v. Harvard University*: Demonstrated that a pro se litigant can effectively use discovery to challenge elite institutions. Robert Bonavito, a self-represented CPA, took on Harvard University in a case involving age and gender discrimination. Despite facing a "\$50 billion war chest" and elite law firms, Bonavito achieved significant procedural wins and public attention. His victory is often used as a case study for how a pro se litigant can effectively use the "discovery" process to force a powerful defendant to account for their actions.
- c. *Toyota Motor Sales, USA, Inc. v. Tabari (2010)*: A pro se victory that protected an entire class of independent brokers. A pro se couple (the Tabaris) won a major victory in the 9th Circuit Court of Appeals against Toyota. While it was an individual trademark case, the ruling protected the rights of all independent brokers and consumers to use brand names in their domain names.

e. CONCLUSION

- 18. **THEREFORE**, the petitioner's financial records — including Schedule C expenses and bank statements showing consistent negative balances — conclusively demonstrate an inability to pay. Denial of IFP status would effectively close the courthouse doors on a meritorious consumer protection claim.
- 19. **WHEREFORE**, the petitioner respectfully requests that the Court:
  - a. GRANT leave to proceed In Forma Pauperis;
  - b. VACATE the prior order denying IFP.

Respectfully Submitted By:

A handwritten signature in black ink, appearing to read 'Wilson Ochar', written over a horizontal line.

Wilson Ochar  
Plaintiff & Pro Se  
Submitted on February 28th 2026  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of February,  
2026, a true copy of the foregoing was filed in the  
United States Supreme Court, and sent by electronic  
mail and first-class mail, postage prepaid, to the  
following:

Lentegrity Customer Service  
27472 Portola Pkwy #205-345  
Foothill Ranch, CA 92610.  
California Debt Collector  
License #10216-99  
Telephone: 833-688-0694  
E-mail: [ca@lentegrity.com](mailto:ca@lentegrity.com)

David R. Mahdavi  
Virginia State Bar Id. # 27417  
MAHDAVI, BACON HALF HILL &  
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Counsel for Defendant Setayesh, Inc.



Wilson Ochar - Plaintiff & Pro Se Party

No. 25-6383

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the plaintiff's filing complies  
with the type-volume limit of 9000 words in  
accordance with the Supreme Court Rule 33.  
*Document Preparation: Booklet Format; 8 1/2- by  
11-Inch Paper Format* because it contains 2619  
words, excluding the parts of the document exempted.

Respectfully submitted this 28th day of February,  
2026,



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Wilson Ochar - Plaintiff & Pro Se

**Additional material  
from this filing is  
available in the  
Clerk's Office.**