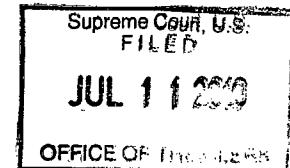


No. 19-19-5252

IN THE
SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 2019

JONATHAN THOMAS WRIGHT,
Petitioner,
vs.
STATE OF WEST VIRGINIA,
Respondent.



MOTION FOR LEAVE TO PROCEED

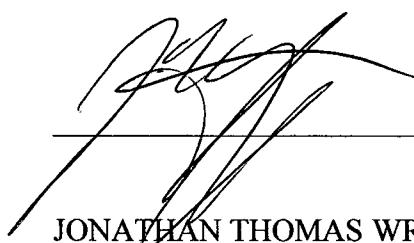
IN FORMA PAUPERIS

The Petitioner, pursuant to Supreme Court Rule 39, moves for leave to file the attached petition for a writ of certiorari to the United States Court of Appeals for the District of Columbia Circuit without prepayment of costs and to proceed *in forma pauperis*.

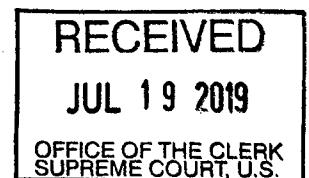
[] Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

[X] Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

Petitioner's affidavit or declaration in support of this motion is attached hereto.



JONATHAN THOMAS WRIGHT
Pro se Petitioner
Post Office Box 2
Belpre, Ohio 45714
(304) 488-8802



**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Jonathan Thomas Wright, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income Source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ 0.00	N/A	\$ 0.00	N/A
Self-employment	\$ 0.00	N/A	\$ 0.00	N/A
Income from real property (such as rental income)	\$ 0.00	N/A	\$ 0.00	N/A
Interest and dividends	\$ 0.00	N/A	\$ 0.00	N/A
Gifts	\$ 0.00	N/A	\$ 0.00	N/A
Alimony	\$ 0.00	N/A	\$ 0.00	N/A
Child Support	\$ 0.00	N/A	\$ 0.00	N/A
Retirement (such as social security, pensions, annuities, insurance)	\$ 0.00	N/A	\$ 0.00	N/A
Disability (such as social security, insurance payments)	\$771.00	N/A	\$771.00	N/A
Unemployment payments	\$ 0.00	N/A	\$ 0.00	N/A
Public-assistance (such as welfare)	\$ 0.00	N/A	\$ 0.00	N/A
Other (specify): _____	\$ 0.00	N/A	\$ 0.00	N/A
Total monthly Income	\$771.00	N/A	\$771.00	N/A

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>None</u>			\$ _____
			\$ _____
			\$ _____

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
<u>N/A</u>			\$ _____
			\$ _____
			\$ _____

4. How much cash do you and your spouse have? \$35.00

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial Institution	Type of Account	Amount you have	Amount your spouse has
<u>Chase Bank</u>	<u>Checking</u>	<u>\$129.72</u>	<u>\$ N/A</u>
<u>First Mutual Bank</u>	<u>Parent's Checking</u>	<u>\$ 209.45</u>	<u>\$ N/A</u>
		<u>\$ _____</u>	<u>\$ _____</u>

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

None

<input type="checkbox"/> Home Value _____	<input type="checkbox"/> Other real estate Value _____
<input type="checkbox"/> Motor Vehicle #1 Year, make & model _____ Value _____	<input type="checkbox"/> Motor Vehicle #2 Year, make & model _____ Value _____
<input type="checkbox"/> Other assets Description _____ Value _____	

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
<u>None</u>	<u>\$ None</u>	<u>\$ N/A</u>
_____	_____	_____
_____	_____	_____

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
<u>None</u>	_____	_____
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your Spouse
Rent or home-mortgage payment (include lot rented for mobile home)	<u>\$ 0.00</u>	<u>\$ N/A</u>
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No	<u>N/A</u>	
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No	<u>N/A</u>	
Utilities (electricity, heating fuel, water, sewer, and telephone)	<u>\$330.00</u>	<u>\$ N/A</u>
Home maintenance (repairs and upkeep)	<u>\$ 0.00</u>	<u>\$ N/A</u>
Food	<u>\$250.00</u>	<u>\$ N/A</u>
Clothing	<u>\$ 60.00</u>	<u>\$ N/A</u>
Laundry and dry-cleaning	<u>\$ 0.00</u>	<u>\$ N/A</u>
Medical and dental expenses	<u>\$ 0.00</u>	<u>\$ N/A</u>

	You	Your Spouse
Transportation (not including motor vehicle payments)	\$ <u>0.00</u>	\$ <u>N/A</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>60.00</u>	\$ <u>N/A</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0.00</u>	\$ <u>N/A</u>
Life	\$ <u>0.00</u>	\$ <u>N/A</u>
Health	\$ <u>0.00</u>	\$ <u>N/A</u>
Motor Vehicle	\$ <u>0.00</u>	\$ <u>N/A</u>
Other: _____	\$ <u>0.00</u>	\$ <u>N/A</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0.00</u>	\$ <u>N/A</u>
Installment payments		
Motor vehicle	\$ <u>0.00</u>	\$ <u>N/A</u>
Credit card(s)	\$ <u>0.00</u>	\$ <u>N/A</u>
Department store(s)	\$ <u>0.00</u>	\$ <u>N/A</u>
Other: _____	\$ <u>0.00</u>	\$ <u>N/A</u>
Alimony, maintenance, and support paid to others	\$ <u>0.00</u>	\$ <u>N/A</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0.00</u>	\$ <u>N/A</u>
Other (specify): _____	\$ <u>0.00</u>	\$ <u>N/A</u>
Total monthly expenses:	\$ <u>700.00</u>	\$ <u>N/A</u>

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

Yes No If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? Yes No

If yes, how much? \$10,000 (The amount outstanding from legal services for state appeals prior to this filing.)

If yes, state the attorney's name, address, and telephone number:

**Joseph H. Spano, Jr., Pritt & Spano, PLLC, 716 Lee Street, East, Suite 204
Charleston, WV 25301, (304) 513-4082**

11. Have you paid – or will you be paying – anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

Yes No

If yes, how much? _____

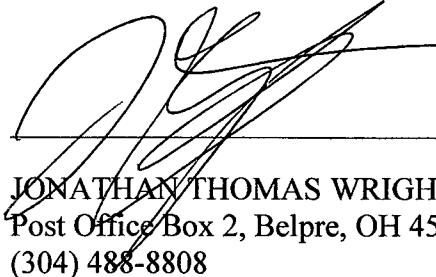
If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

I have been unable to work for a number of years due to a severe neurological disability and receive only Social Security disability benefits based on need.

I declare under penalty of perjury that the foregoing is true and correct.

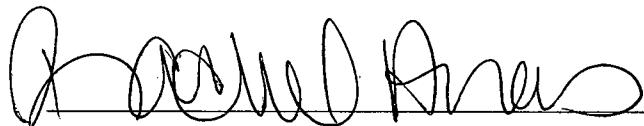
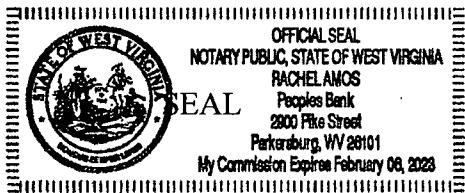
Executed on: July 11, 2019.


JONATHAN THOMAS WRIGHT, *Pro Se* Petitioner
Post Office Box 2, Belpre, OH 45714
(304) 488-8808

STATE OF WEST VIRGINIA

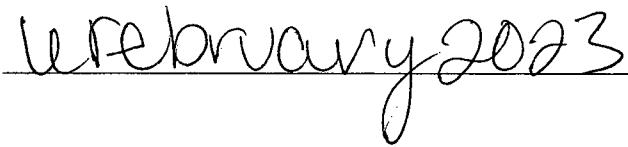
COUNTY OF WOOD

Subscribed and sworn before me this 11th day of July 2019.

A handwritten signature of the notary, "Rachel Amos", is written over a horizontal line.

Notary

My commission expires

A handwritten signature of the date, "February 2023", is written over a horizontal line.