

19-7538
No.

IN
SUPREME COURT OF THE UNITED STATES

ORIGINAL

Victoria Carlson et vir,

VS.

Jodi Harpstead, Commissioner, Minnesota Department of Human Services, et al.

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The petitioner asks leave to file the attached petition for a writ of certiorari 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):

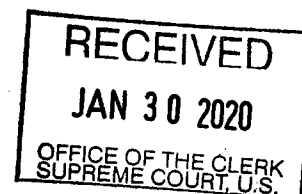
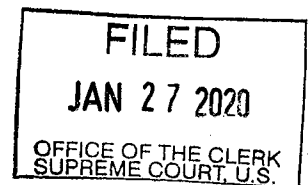
+ Petitioner's affidavit or declaration in support of this motion is attached hereto.

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

Executed on January 22, 2020.

Victoria Carlson

Jodi Harpstead



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

I, **Victoria L Carlson**, 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.

		Victoria	Stephen	Victoria	Stephen
Income source		Average monthly amount during the past 12 months		Amt expected next month	
Employment		250	200	200	150
Self-Employment		0	0	0	0
Income from real property		0	0	0	0
(such as rental property)		0	0	0	0
Gifts		0	0	0	0
Alimony		0	0	0	0
Child Support		0	0	0	0
Retirement		640	680	640	693
Disability		0	0	0	0
Unemployment payments		0	0	0	0
Public Assistance		0	0	0	0
Other		0	0	0	0
TOTAL MONTHLY INCOME		890	880	840	843

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
Whelan Security	199 Coon Rapids Blvd NW #308, Coon Rapids, MN 55433	2012 - Present	\$200-300
Salvation Army	2445 Prior Ave N, Roseville, MN 55113	Seasonal 2012 - Present	\$180/wk part- time Holiday

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
Whelan Security	199 Coon Rapids Blvd NW #308, Coon Rapids, MN 55433	2014 - Present	\$150-250

Salvation Army	2445 Prior Ave N, Roseville, MN 55113	Seasonal 2012 - Present		\$250/wk part- time Holiday

4. How much cash do you and your spouse have? \$1000. Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Fincl institution	Account Type	Amount you have		Amount your spouse has	
Twin Cities Federal	Checking	\$100		\$300	

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

Neither of us owns any assets.

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

No one owes either of us money.

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


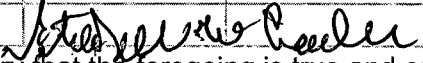
No one relies on either of us for support.

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	Spouse	
Rent	\$457	\$457	
Utilities	\$68	\$68	
Home maintenance	\$80	\$25	
Food	\$80	\$100	
Clothing	\$40	\$15	
Laundry	\$40	\$40	
Medical/dental	\$100	0	
Transportation	\$60	\$60	
Recreation	\$4	\$4	
Insurance (co-pay)	\$20	0	
Taxes	0	0	
Installment	0	0	
Alimony/support	0	0	
Business/Prof	0	0	
Other (Birds, Cat)	\$60	\$15	
Other (Legal)	0	\$150	
	\$1,009	\$934	\$1,943

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

NO, I do not

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?					
NO, my husband did it.					
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?					
NO, my husband did it.					
12. Provide any other information that will help explain why you cannot pay the costs of this case.					
Victoria is paying for medical care during her cancer treatment, is in collections for that, and is avoiding needed medical care for inability to pay, and is paying bills unpaid by the MA-BC program although her treatment is still needed. She currently gets charity from the hospital but many important costs are not covered. Victoria cannot get work except for sitting positions, indoors, in her part-time security work and often that is not there. Stephen needs to work on these legal challenges to the cut-off of her breast cancer treatment coverage and must turn down jobs. We're on partial Social Security retirement while both of us are still living and that is very limited, we were forced into early retirement. We do go to the food shelf to supplement our diet. Rent may go up. Stephen helps Victoria with costs by saving from small income. We just want to get her medical care paid for as promised when she was enrolled in BCCPTA/MA-BC for cancer treatment. We are, of course, grateful she has survived since 2013 when she was diagnosed with a high-grade tumor.					
  1-19-20					
I declare under penalty of perjury that the foregoing is true and correct.					
Executed on: January 23, 2020					