

No. 19-7559

Under / Spelling Term

IN THE

SUPREME COURT OF THE UNITED STATES

ORIGINAL

FILED

DEC 12 2019

OFFICE OF THE CLERK
SUPREME COURT, U.S.

ELIJAH JACKSON, JR., et al.

(Your Name)

PETITIONER

United States Department of
Housing and Urban Development et al.

VS.

RESPONDENT(S)

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*.

Please check the appropriate boxes:

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

☒ 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.

☐ Petitioner's affidavit or declaration is not attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____

_____, or

☐ a copy of the order of appointment is appended.

RECEIVED

DEC 19 2019

OFFICE OF THE CLERK
SUPREME COURT, U.S.

(Signature)

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

I, JACKSON, JR., ESTHER, 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	\$ 0	\$ 0	\$ 0
Self-employment	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Income from real property (such as rental income)	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Interest and dividends	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Gifts \$40-80	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Alimony	\$ 0	\$ 0	\$ 0	\$ 0
Child Support	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Retirement (such as social security, pensions, annuities, insurance)	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Disability (such as social security, insurance payments)	\$ 0	\$ 0	\$ 0	\$ 0
Unemployment payments	\$ 0	\$ 0	\$ 0	\$ 0
Public-assistance (such as welfare)	> \$ 1.00	\$ 0	> \$ 1.00	\$ 0
Other (specify): LEGAL CONSULTATION	> \$ 1.00	\$ 0	> \$ 6.00	\$ 0
Total monthly income:	> \$ 8.00	\$ 0	> \$ 13.00	\$ 0

COLUMBIA Mutual Life Insurance Company EN # 15-00744
55 Annual Policy # C90000070

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

59-2065878 9-16/1824 1995-2010

Employer	Address	Dates of Employment	Gross monthly pay
✓ THE JBS GROUP, ET AL.	P.O. Box 92815/804	9-16/1824	\$ 1.00
✓ LAKECROSS, FLORIDA	33804-2895	33802-0854 1995	\$ 1.00

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.)

ANNA 9-18-2001 SALARY PER YR. \$1,872,000.00

Employer	Address	Dates of Employment	Gross monthly pay
✓ JBS JACKSON CHAIRMAN		9-1-2006	\$ 333,000.00
✓ JACKSON FOUNDATION AND FAMILY TRUSTS		10-1-2007	\$ 127,000.00

4. How much cash do you and your spouse have? \$ > 1.00

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

57023 HET

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
✓ HANSEN ELECTRIC TRUSTS	\$ > 1.00	SHAREHOLDER SET UP PER
✓ HANSEN EMP. / RETIREMENT SERVICE	SEE 53-2005-AP-09/2005-	

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

2090 interest in 12-88-83-050500-010/20 SC-299

SEE 53-2004-AP-07

☒ Home

Value > 15,063.00

☐ Other real estate

Value

☒ Motor Vehicle #1

Year, make & model

☒ Motor Vehicle #2

Year, make & model

Value 53-2003-SC-6250

Value 53-2003-SC-6089

☒ Other assets

Description

Value > 1.00

INTELLECTUAL PROPERTIES

JALBERT FORD OF KANT GUY, INC. ET AL.

LAKECROSS MUTZ MOTORS LIMITED PARTNERSHIP / AUTO MAX

SEE ALSO 53-2004-AP-10 53-2003-SC-6006

CUTLER'S MOTORS, ET AL - WAYNE BLACKSHEAL, ET AL.

EMPLOYMENT DATA REPORTED / EMPLOYER

- ✓ JPS MANAGEMENT CORPORATION 2-1-1997 7 \$ 706,000.00
- ✓ JACKSON BROADCASTING 5-1-1996 7 \$ 706,000.00
- ✓ WEBS FALCO WNY 2 SAVE SAVINGS # 280 2743 753 \$ 1.00
- ✓ SEARS HOLDING CORPORATION # 00001051610 7 \$ 1.00
- ✓ THE FLORIDA FEDERAL CREDIT UNION, ET AL. 7
- ✓ 53-2004-AP-11 53-2003-SC-5266
- ✓ CASH AMERICA PACUN #1 CASH AMERICA Int'l, Inc., ET AL. 7
- ✓ 53-2006-AP-07 53-2006-SC-356
- ✓ COMMUNITY OF 1st COMMUNITY CREDIT UNION, ET AL. 7
- ✓ 53-2006-AP-06 53-2006-SC-350
- ✓ BANK OF AMERICA CO, N.A. AND USA, ET AL. 7
- ✓ 53-2006-AP-03 53-2003-SC-6018
- ✓ 4356-2000-0276-3/48, 3/59, 3/63, 3/71, AND 3/89
- ✓ COMPUTER SHARE INVESTOR SERVICES # 00001051610 7 \$ 1.00

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

JBS CORPORATION > \$ 1.00 \$ 0
JBS TRUSTS > \$ 1.00 \$ 0
JBS PARTNERSHIPS > \$ 1.00 \$ 0

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name Relationship Age
MELCENS ALEXIS JACKSON DAUGHTER 22
ELIJAH ELIAS JACKSON, III SON 19
SEE 53-2007-AP-7077; SC05-925; 2004-1245; 53-1997-AP-5270

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.

G-STORE IT MENT WAREHOUSE, ET AL. 53-2004-AP-14
53-2003-SC-6014

Rent or home-mortgage payment
(include lot rented for mobile home)

Are real estate taxes included? ☐ Yes ☐ No

Is property insurance included? ☐ Yes ☐ No

Utilities (electricity, heating fuel,
water, sewer, and telephone)

Home maintenance (repairs and upkeep)

Food

Clothing

Laundry and dry-cleaning

Medical and dental expenses

EMS MEDICAL SERVICES/MAYO, ET AL. 53-2006-AP-09
53-2006-SC-362

COAST DENTAL/PROCTER, P.A., ET AL. 53-2006-AP-02
53-2003-SC-5256

F.S. 944
Transportation (not including motor vehicle payments) You \$ 0 Your spouse \$ 0

Recreation, entertainment, newspapers, magazines, etc. You \$ 1.00 Your spouse \$ 0

Insurance (not deducted from wages or included in mortgage payments) You \$ 0 Your spouse \$ 0

Homeowner's or renter's You \$ 1.00 Your spouse \$ 0

Life You \$ 1.00 Your spouse \$ 0

Health You \$ 0 Your spouse \$ 0

Motor vehicle You \$ 0 Your spouse \$ 0

Other You \$ 1.00 Your spouse \$ 0

Taxes (not deducted from wages or included in mortgage payments) You \$ 1.00 Your spouse \$ 0

State and Florida taxes (specify): You \$ 1.00 Your spouse \$ 0

Installment payments You \$ 0 Your spouse \$ 0

Motor vehicle You \$ 0 Your spouse \$ 5,998.04

Credit card(s) You \$ 1.00 Your spouse \$ 0

Department store(s) You \$ 0 Your spouse \$ 0

Other: You \$ 19,334.86 Your spouse \$ 0

Alimony, maintenance, and support paid to others You \$ 1.00 Your spouse \$ 0

Regular expenses for operation of business, profession, or farm (attach detailed statement) You \$ 1.00 Your spouse \$ 0

Other (specify): You \$ 1.00 Your spouse \$ 0

Total monthly expenses: You \$ 19,745.86 Your spouse \$ 5,998.04

SEE ATTACHMENTS
The total monthly expenses for petitioner is negative \$19,745.86 whereas ex-spouse is negative \$5,998.04.

✓ WECN Financial, LLC 2100 EAST ELST ROAD BLD 94
TEMPE, AZ. 85284-1806 OR P.O. Box 15009, 85284-0109

JACKSON V. JACKSON
FROM 12-4-2002 D.R. JACKSON, ET AL. V. X
53-2002-DR-007027-SC05-925; 2004-1245

264-73-9777 2-11-63 0250-172-63-551-0

53-2013-CA-006143-0000-00

53-2004-AP-000002-0000-00

JACKSON V.
JACKSON

53-2003-SC-005255-0000-00

53-2004-AP-000006-0000-00

JACKSON V.
JACKSON

53-2003-SC-005268-0000-00

8:2016-CV-00559-MBS-MAP OR T-35MAP
11th Cir. Appeal # 16-11400-C D.R. JACKSON

CFPB # 150611-001876 COMPLAINTS V. D.R. JACKSON
150611-001968 COMPLAINTS V. D.R. JACKSON
150611-001971 COMPLAINTS V. D.R. JACKSON

WECN Financial, LLC Account # 76318491-8

1400 LANDMARK TOWERS, 345 ST. PETER STREET, ST. PAUL, MN.

05/02:

- ✓ DIRECT FRANCHISE, LLC # 763/8491-8
8:16-01-00559-MS-MAP OR T-35 MAP
MANUFACTURING HOUSEHOLD CONTRACT SELLER/SUBORDINATE MS-THU
CENTRE TRUST 1996-3; 1555 W. WALNUT PARK LANE, SHELLE
100, FLORENCE, TX. 75038

- ✓ MARK SHALE # 940003256 XXXX 6-1-1986 FURTHER
ACCOUNT; REVOLVING ACCOUNT; AND EXCHANGE ACCOUNT > \$0
TRANSUNION FIVE # 310700463
285 GRAND AVENUE, BLDG. 5, 2ND FLOOR, EVREGLAND, NE.
0.7631 (201) 489-2111

- ✓ UNITED STATES DEPARTMENT OF EDUCATION
FEDERAL STUDENT AID > \$12,902.00, 1.00

- ✓ FLORIDA DEPARTMENT OF EDUCATION
OFFICE OF STUDENT FINANCIAL ASSISTANCE "OSFA"
> \$14,163.64 > 1.00

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.

SEE FEDERAL NOTICE OF PENDENCY OR RELATED CASES ATTACHED > \$1.00 CAUSIDTS / SETTLEMENTS, ETC. OR HIRGALAN, ETC.

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?

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

SEE ALBERT WILLIAM BARRY, III, ESQ., 53-2004-AP-04
SEE RICHARD TAYLOR McLENDON, ESQ. AND P.A., 53-2004-AP-03
53-2003-SC-6014, 6017-DOXXX
UNCERTAIN / UNRECORDED

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:

UNKNOW > \$1.00
FELEORA ZIMMERMAN, POA 404 ADOLEMAN STREET, LAKELAND, FLORIDA 33805 861-559051;
AND SUMMITA GREEN, POA 5439 WEBER PLACE, LAKELAND, FLORIDA 33809-4271 862-670-0089; AND
PAGE D. PETERSON, POA 303 W. MULBERRY STREET, LAKELAND, FLORIDA 33815

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

PLA 1:19-cv-00380-SAM-LT APPEAL 9TH CIR. #19-16661
PLA 8:17-cv-01294-EMK-SPE APPEAL 11TH CIR. #17-15218

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

Executed on:

January 31

, 2020

DEUS MEUMQUE DUS TOE.
SPEA MATHA DED EST

(Signature)

AEADONMS 33
KEPAA HAT

11. Enit.

863-666-7575 FELICIA KAMMELMAN, POA 261-55-9051
863-816-6315 PAMELA D. PETERSON, POA 262-29-5093

12. Enit.

12. 53-1999-DL-005270-0000-00 EXCEEDS > \$638,460.
00 AS OF 12-31-2017 CSE
DEBTS FOR POLK COUNTY COUNT 10TH QTR. CTR. EXCEEDS > \$210,000.00
FOR > 8 CASES; AND DEBTS FOR POLK COUNTY CREDIT COUNT 10TH
QTR. CTR. EXCEEDS > \$450,000.00 FOR > 10 CASES; WHEREAS
PERSONS ARE PETITIONED > \$280,000.00 FOR > 28
CASES "CE OR CA".

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