

No. 19-8001

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

Valery Vinarov — PETITIONER  
(Your Name)

VS.

CitiMortgage, Inc and JP Morgan Chase RESPONDENT(S)

FILED  
FEB 24 2020  
OFFICE OF THE CLERK  
SUPREME COURT, U.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):

Circuit Court of Cook County

Illinois Appellate Court 1st District

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.

  
(Signature)

RECEIVED

MAR 16 2020

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

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

I, Valery Vinarov, 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	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Self-employment	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Income from real property (such as rental income)	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Interest and dividends	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Gifts	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Alimony	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Child Support	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>2,177.5</u>	\$ <u>N/A</u>	\$ <u>2,177.5</u>	\$ <u>N/A</u>
Disability (such as social security, insurance payments)	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Unemployment payments	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Public-assistance (such as welfare)	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
Other (specify): _____	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>	\$ <u>N/A</u>
<b>Total monthly income:</b>	<b>\$ <u>2,177.5</u></b>	<b>\$ <u>N/A</u></b>	<b>\$ <u>N/A</u></b>	<b>\$ <u>N/A</u></b>

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

<b>Employer</b>	<b>Address</b>	<b>Dates of Employment</b>	<b>Gross monthly pay</b>
Retired			\$ _____
			\$ _____
			\$ _____

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.)

<b>Employer</b>	<b>Address</b>	<b>Dates of Employment</b>	<b>Gross monthly pay</b>
Single, not married			\$ _____
N/A			\$ _____
			\$ _____

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

<b>Type of account (e.g., checking or savings)</b>	<b>Amount you have</b>	<b>Amount your spouse has</b>
Checking	\$ \$5.00	\$ _____
Depends what part of the Month, Last week before Retirement Check, cannot buy loaf of bread	\$ _____	\$ _____
	\$ _____	\$ _____

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

Home  
 Value N/A

Other real estate  
 Value N/A

Motor Vehicle #1  
 Year, make & model Jaguar XJ8, 2003  
 Value \$4,450

Motor Vehicle #2  
 Year, make & model Volvo 240, 1989  
 Value \$775.00

Other assets  
 Description \_\_\_\_\_  
 Value N/A

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

<b>Person owing you or your spouse money</b>	<b>Amount owed to you</b>	<b>Amount owed to your spouse</b>
JPMorgan Chase	\$ 56,175,000	\$ N/A Single
CitiMortgage	\$ 2,175,000	\$ _____
_____	\$ _____	\$ _____

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").

<b>Name</b>	<b>Relationship</b>	<b>Age</b>
Irina Vinarov - disabled	Sister	65 years old
_____	_____	_____
_____	_____	_____

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.

	<b>You</b>	<b>Your spouse</b>
Rent or home-mortgage payment (include lot rented for mobile home)	\$ N/A currently	\$ N/A
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 657.13	\$ N/A single
Home maintenance (repairs and upkeep)	\$ 232.2	\$ N/A Single
Food	\$ 562.97	\$ _____
Clothing	\$ Can't afford	\$ _____
Laundry and dry-cleaning	\$ 227.34	\$ _____
Medical and dental expenses	\$ 53.00 for both	\$ _____

	<b>You</b>	<b>Your spouse</b>
Transportation (not including motor vehicle payments)	\$ 116.57 (Fuel)	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	\$ N/A can't afford	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 97.83	\$ _____
Life	\$ _____	\$ _____
Health	\$ _____	\$ _____
Motor Vehicle	\$ 144.2	\$ _____
Other: _____	\$ _____	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): Not taxable income	\$ N/A	\$ _____
Installment payments		
Motor Vehicle	\$ N/A	\$ _____
Credit card(s)	\$ N/A	\$ _____
Department store(s)	\$ 86	\$ _____
Other: _____	\$ _____	\$ _____
Alimony, maintenance, and support paid to others	\$ N/A	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____
<b>Total monthly expenses:</b>	<b>\$ 2177.27</b>	<b>\$ N/A Single</b>

Typ

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? \_\_\_\_\_

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

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.

Will answer in Additional Information

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

Executed on: March 3, 2020



(Signature)

### **Additional Information.**

I, Valery Vinarov, support my sister Irina who is disabled after car accident (hit by young girl driving on drugs). Irina has very serious damage to her back, legs and both feet. She currently does not have any income my small pension of \$582.60 and Social Security retirement benefit of \$1,594 (see attached copy of Social Security Administration Letter) after Medicare and medications deductions is the only income we live on.

The Amount owed to us, and which we are trying to recover, includes cost of labor invested into business development (software), very conservatively calculated using data available from US Department of Labor and experience gained in managing advanced technology SW development organization of large US Corporation. We would like to recover our 401K savings with interest invested into business destroyed by Chase actions.

The way 401k was invested, it used to gain 12-14% annually. Both Vinarovs or Valery, makes no difference, are entitled to be compensated for False Claims filed by Chase and Citi – 3 times of Property Value. Property value was assessed by WaMu to be equal to \$725,000, just a few month before Chase filed Foreclosure litigation against Valery. We did not calculate our business losses. However, our Russian business partners did using services of Russian company like PricewaterhouseCoopers, we do not claim our loses in this litigation. They estimate their losses for 6 companies, 11 years equal to \$1.3 trillion, and our losses to be \$1.2 trillion. It is obvious that what we would like to recover is not even close to \$2.5 trillion. Chase would have to pay if litigation is instigated in Russia. Most of what we attempting to recover in this litigation will be donated to charity organizations anyway.

I use debit card to pay all of our food/groceries costs, utilities and insurance are e-paid from our bank account. All numbers listed in the document, are copied from monthly bank e-statement. Very accurate.

There is a discrepancy of \$1 between Social Security Administration letter (attached) and what is actually transferred to the bank. I do not know why.

We are not looking for any favors or considerations of our age, just Justice and Fairness, enforcement of existing laws. We believe that if one takes the money, he/she has to return it, if money are given honestly and in compliance with Law. Prior to accepting loan from WaMu, we were considering selling the house and buying something smaller. We would not be in Court and would have substantially more money to fund our business. WaMu executives were extremely interested to invest in our business and back then we had no knowledge that we would be defrauded and rubbed by financial institutions. We were defrauded by WaMu/Chase.

If we knew that WaMu was engaged in origination of fraudulent loans, we would not ever take anything from them, that not to say that we would not accept \$250,000 loan **which was insufficient to adequately support business goals and objectives.** WaMu was promising unlimited credit. 85% of all failed businesses in US, fail as result of inadequate funding. By breaching the Contract, Chase is guilty of destruction of our business and our lives. We simply were defrauded and robbed. Likewise, who could anticipate at that time, that large bank like Citi would be involved in documents falsification??? Both banks have NO valid Liens as mandated by Bankruptcy Laws.

We are financially destroyed, if we would continue to invest in 401K plan as we did, it would be over \$1,000,000.00 by now. We would be able to retire and live normal lives. Instead, as result of robbery taken place right under US Judicial System roof, we are barely making ends to meet. **US Supreme Court is the only hope we have to see Justice prevail.** Historically, US Supreme Court accepted all cases concerning violations of Property Ownership Rights. **In our case, this is not just violation of Constitution, but also unspeakable and atrocious Fraud upon the Court.** Unfortunately, we do not have money to pay court costs, and hope that petition is granted. We beg this court to accept, review and adjudicate our case. We are trying to avoid becoming focal point in large international scandal and destruction of US financial system. We would like to hope that Justices would agree with common logic, that if our petition is not accepted, then Supreme Court would have to review same case anyway, business aspect of it, just it will be presented by Supreme Court of Russian Federation with claims of very large business losses. If there is just a shadow of pride for this Country's Judicial System, US Constitution and sense of civic duty, our Petition will be accepted so what happened to us, would never happened to anyone else. There are over 25 million Foreclosures in this Country. How many Americans' Constitutional rights were violated, how many cases of Fraud upon the Court were committed by Banks and their attorneys, and how many more will be there in the future?

As a matter of Law, Irina is ABSOLUTE OWNER of the property her Tax Lien is superior to any of the banks' mortgages. She invested in the property MORE MONEY than any of the banks. **Why Illinois Courts did not compensate her and expropriating Property Bolsheviks' style?**

If the Court of the Land – US Supreme Court will do nothing and we cannot find Justice in this Country, and Fraud, falsification of documents (proven facts) are validated, if violation of US Constitution is validated, and we are evicted by the individual and his attorney who HAS NO right to the house, who DID NOT PAY A PENY for it (documented in Court Order), and his case was dismissed with prejudice (attached), **and another Judge takes liberty to adjudicate the case without jurisdiction and without authority overrides other two judges orders?** If violation of Law, US Constitution and fraud committed by both banks are validated, then the only recourse we would have is to start litigation in Russia, and we will.

We believe that all of this lawlessness and inequity took place only because we are US citizens of Russian origin, there is no other reason. Many years ago, being proud US Citizens, we were the only ones in US who offered business to Gorbachev and produced video seminar "Doing business in the USSR" with participation of large US corporations: Ernst & Young, Backer and McKenzie, Illinois department of Agriculture and we brought religious groups as Mr. Schuller-Cristal Cathedral, Dr. Dobbs and others to improve cultural, business and religious relations, which resulted in meetings between President Regan and Gorbachev. Is that American gratitude for hard work dedicated to secure success of US Companies doing business in Russia? It is a GREAT LESSON for others not to repeat our mistake believing in Liberty and Justice for ALL

Sincerely,

Valery Vinarov

