

19-8807
No. _____

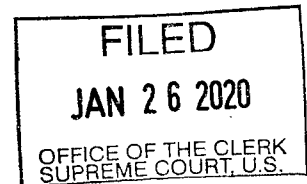
ORIGINAL

IN THE
SUPREME COURT OF THE
UNITED STATES

CASSANDRA CEAN, PETITIONER

v.

UNITED STATES OF AMERICA, RESPONDENT.



MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

Petitioner was represented by court-appointed counsel at her trial, and granted leave to proceed *in forma pauperis* in the Second Circuit Court of Appeal Exhibit A.

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

Respectfully Submitted,

Cassandra Cean
Pro Se
23 Ocean Avenue
Valley Stream, NY 1150
(516)410-0124

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

I, CASSANDRA LEAN, 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>300.00</u>	\$ <u>100,000.00</u>	\$ <u>N/A</u>	\$ <u>3,000.00</u>
Self-employment	\$ <u>0</u>	\$ <u>~50,000.00</u>	\$ <u>0</u>	\$ <u>2,000.00</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>26,800.00</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u> </u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u> </u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>300.00</u>	\$ <u>176,800.00</u>	\$ <u>0</u>	\$ <u>5,000.00</u>

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
DANBURY Federal Prison Camp	33 1/2 Pembroke Rd. DANBURY, CT 06811	2/16 - 4/20	\$ 30.00
N/A	N/A	N/A	\$ N/A
N/A	N/A	N/A	\$ N/A

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
CEAN OWENS LAW	23 Ocean Avenue Valley Stream, NY 11580	11/2015 - Present	\$ 2,000.00
Allied Universal	229 W. 36 th St, NY, NY	2/2020 - Present	\$ 3,000.00
N/A	N/A	N/A	\$ N/A

4. How much cash do you and your spouse have? \$ 50.00
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
Pre-paid debt card	\$ 500.00	\$ 0
Checking	\$ 0	\$ 568.00
N/A	\$ N/A	\$ N/A

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

☒ Home
Value \$450,000.00 in foreclosure

☒ Other real estate
Value 350,000

☒ Motor Vehicle #1
Year, make & model Chevy Equinox 2019
Value \$30,000.00

☐ Motor Vehicle #2
Year, make & model N/A
Value N/A

☒ Other assets
Description Real Estate
Value \$375,000.00

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
Bert LNU	\$ 5,000.00	\$ 0
N/A	\$ N/A	\$ N/A
N/A	\$ N/A	\$ N/A

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
C. O.	daughter	5 years old
N/A	N/A	N/A
N/A	N/A	N/A

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)	\$ ~5,000	\$ 2,560
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 0	\$ 1,000.00
Home maintenance (repairs and upkeep)	\$ 0	\$ 100.00
Food	\$ 150	\$ 550.00
Clothing	\$ 30	\$ 100.00
Laundry and dry-cleaning	\$ 30	\$ 50.00
Medical and dental expenses	\$ 0	\$ 775.00

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>280.00</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>80.00</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>151.00</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>200</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>455.00</u>
Credit card(s)	\$ <u>0</u>	\$ <u>300.00</u>
Department store(s)	\$ <u>0</u>	\$ <u>100.00</u>
Other: _____	\$ <u>0</u>	\$ <u>100.00</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u>child care</u>	\$ <u>0</u>	\$ <u>600.00</u>
Total monthly expenses:	\$ <u>0</u>	\$ <u>0</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? N/A

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

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? N/A

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

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

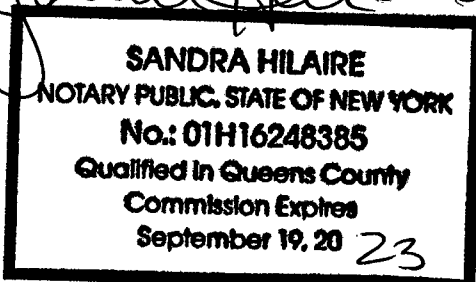
I AM INCARCERATED SINCE 11/17/2015 AND AM CURRENTLY
CONFINED TO MY HOME WITHOUT ANY INCOME.

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

Executed on: June 5, 2020

Sandra Hilaire 6/5/2020

Cassandra Cean
(Signature)




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

I expect that my monthly income will be severely diminished. As a result of the Novel Corona Virus-19 Pandemic ("COVID-19"), my family is currently suffering financially. And due to the devastation on local business and our economy by COVID-19, I am now a charity case since I have been unable to find employment or receive unemployment benefits.

I am also at imminent risk of the loss of my real estate due to foreclosure and the lack of financial resources.

Sincerely,


Cassandra Cean

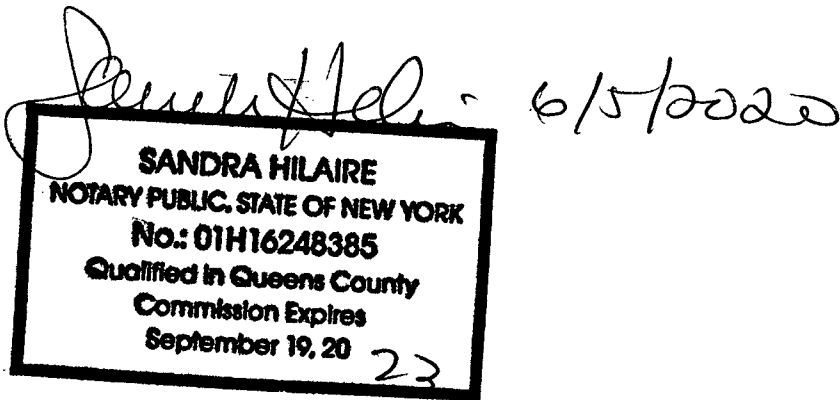


EXHIBIT "A"

**UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT**

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 2nd day of March, two thousand and fifteen.

Before: Gerard E. Lynch,
Circuit Judge.

United States of America,
Appellee,

v.

Bibi Omar, AKA Zameena Omar,
Defendants,

Kim Ramlochan, AKA Kim Cupeles, AKA Kim
Yohay, Shane Browne, Cassandra Cean,
Defendants-Appellants.

ORDER

Docket Nos. 14-605 (L);
14-2182 (Con);
14-2282 (Con)

Vivian Shevitz, co-counsel for Appellant Cassandra Cean, moves for leave to file an interim CJA voucher.

IT IS HEREBY ORDERED that the motion is GRANTED.

For the Court:
Catherine O'Hagan Wolfe,
Clerk of Court