

DOCKET NO. \_\_\_\_\_

IN THE

**SUPREME COURT OF THE UNITED STATES**

**OCTOBER TERM, 2019**

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**JEREMIAH (“JENNA”) RODGERS,**

Petitioner,

vs.

**STATE OF FLORIDA**

Respondent.

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**MOTION FOR LEAVE TO PROCEED IN *FORMA PAUPERIS***

**COMES NOW**, the Petitioner, **JEREMIAH (“JENNA”) RODGERS**, by and through undersigned counsel, and moves for leave of this Court to proceed *in forma pauperis* in this proceeding. Petitioner has been found indigent by each state court in which she has challenged this conviction and sentence and has been permitted to proceed *in forma pauperis* before each of those courts: the Florida Supreme Court and the Circuit Court of the First Judicial Circuit in and for Santa Rosa County, Florida.

WHEREFORE, Petitioner moves the Court for leave to proceed in this action *in forma pauperis*.

I HEREBY CERTIFY that a true copy of the foregoing motion has been furnished by United States Mail, first-class postage prepaid, to all counsel of record on July 7, 2020.

/s/. Linda McDermott  
LINDA McDERMOTT  
Assistant Federal Defender  
Florida Bar No. 0102857  
Office of the Federal Public Defender  
Northern District of Florida  
227 North Bronough St., Suite 4200  
Tallahassee, Florida 32301  
(850) 942-8818  
linda\_mcdermott@fd.org

Attorney for Petitioner

# ATTACHMENT

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

I, Jeremiah Rodgers, 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>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Self-employment	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Income from real property (such as rental income)	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Interest and dividends	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
<u>Gifts</u>	\$ <u>200.00 - 250.00</u>	\$ _____	\$ <u>200.00 - 300.00</u>	\$ _____
Alimony	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Child Support	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Unemployment payments	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Public-assistance (such as welfare)	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
Other (specify): _____	\$ <u>0</u>	\$ _____	\$ <u>0</u>	\$ _____
<b>Total monthly income:</b>	\$ <u>200.00 - 250.00</u>	\$ _____	\$ <u>200.00 - 300.00</u>	\$ _____

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

None.

Employer	Address	Dates of Employment	Gross monthly pay
			\$
			\$
			\$

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
			\$
			\$
			\$

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.

Financial institution	Type of account	Amount you have	Amount your spouse has
Inmate	Bank	\$ approx. 200.00	\$
		\$	\$
		\$	\$

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

None

Home

Value \_\_\_\_\_

Other real estate

Value \_\_\_\_\_

Motor Vehicle #1

Year, make & model \_\_\_\_\_

Value \_\_\_\_\_

Motor Vehicle #2

Year, make & model \_\_\_\_\_

Value \_\_\_\_\_

Other assets

Description \_\_\_\_\_

Value \_\_\_\_\_

6. State every person, business, or organization owing you or your spouse money, and the amount owed. None.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

7. State the persons who rely on you or your spouse for support. None.

Name	Relationship	Age
_____	_____	_____
_____	_____	_____
_____	_____	_____

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</u>	\$ _____
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)	\$ <u>0</u>	\$ _____
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ _____
Food	\$ <u>150.00 - 200.00</u>	\$ _____
Clothing	\$ <u>0</u>	\$ _____
Laundry and dry-cleaning	\$ <u>0</u>	\$ _____
Medical and dental expenses	\$ <u>0</u>	\$ _____

	<b>You</b>	<b>Your spouse</b>
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	\$ _____	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ _____
Life	\$ <u>0</u>	\$ _____
Health	\$ <u>0</u>	\$ _____
Motor Vehicle	\$ <u>0</u>	\$ _____
Other: _____	\$ <u>0</u>	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ _____
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ _____
Credit card(s)	\$ <u>0</u>	\$ _____
Department store(s)	\$ <u>0</u>	\$ _____
Other: _____	\$ <u>0</u>	\$ _____
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ _____
Other (specify): _____	\$ <u>0</u>	\$ _____
<b>Total monthly expenses:</b>	<u>\$ 150.00 - 200.00</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? \_\_\_\_\_

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.

Incarcerated since 2000.

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

Executed on: March 16<sup>th</sup>, 2020

Jeremiah M. Rodriguez  
(Signature)

FLORIDA DEPARTMENT OF CORRECTIONS  
TRUST FUND ACCOUNT STATEMENT  
FOR: 11/01/2019 - 04/28/2020

04/28/20  
07:36:21  
PAGE 1

ACCT NAME: RODGERS, JEREMIAH M.  
BED: P2226S  
PO BOX:

ACCT#: 123101  
TYPE: INMATE TRUST

POSTED DATE	NBR	TYPE	REFERENCE NUMBER	FAC	REMITTER/PAYEE	+/-	BEGINNING BALANCE 11/01/19	\$0.00
11/02/19	220	JPAY DEPOSIT	107774134	000	MANTON, MARGARETANN	+	\$90.00	\$90.00
11/04/19	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.60	\$89.40
11/04/19	247	JPAY DEPOSIT	107848893	000	STEIN, SUSAN	+	\$100.00	\$189.40
11/06/19	043	CANTEEN SALES	21320191105	000		-	\$50.02	\$139.38
11/06/19	270	JPAY MEDIA W/D	000058929845	000		-	\$10.00	\$129.38
11/11/19	162	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.50	\$128.88
11/12/19	043	CANTEEN SALES	21320191111	000		-	\$60.37	\$68.51
11/12/19	619	JPAY DEPOSIT	108205466	000	STEIN, SUSAN	+	\$180.00	\$248.51
11/13/19	276	JPAY MEDIA W/D	000059310872	000		-	\$12.00	\$236.51
11/14/19	242	JPAY MEDIA W/D	000059370104	000		-	\$15.00	\$221.51
11/18/19	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.60	\$220.91
11/18/19	315	JPAY MEDIA W/D	000059609887	000		-	\$7.00	\$213.91
11/19/19	043	CANTEEN SALES	21320191118	000		-	\$67.85	\$146.06
11/19/19	297	JPAY MEDIA W/D	000059647566	000		-	\$7.00	\$139.06
11/25/19	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.68	\$138.38
11/25/19	258	JPAY MEDIA W/D	000059954158	000		-	\$15.00	\$123.38
11/26/19	043	CANTEEN SALES	21320191125	000		-	\$54.66	\$68.72
11/27/19	343	JPAY MEDIA W/D	000060041560	000		-	\$8.00	\$60.72
12/02/19	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.55	\$60.17
12/02/19	224	JPAY DEPOSIT	1090000160	000	MANTON, MARGARETANN	+	\$90.00	\$150.17
12/02/19	235	JPAY MEDIA W/D	000060303067	000		-	\$8.00	\$142.17
12/03/19	043	CANTEEN SALES	21320191202	000		-	\$41.19	\$100.98
12/09/19	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.41	\$100.57
12/10/19	373	JPAY DEPOSIT	109332796	000	STEIN, SUSAN	+	\$200.00	\$300.57
12/11/19	043	CANTEEN SALES	21320191210	000		-	\$47.69	\$252.88
12/11/19	244	JPAY MEDIA W/D	000060814275	000		-	\$15.00	\$237.88
12/15/19	122	JPAY DEPOSIT	109560030	000	HUSBAND, ELIZABETH M.	+	\$50.00	\$287.88
12/16/19	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.48	\$287.40
12/17/19	043	CANTEEN SALES	21320191216	000		-	\$84.82	\$202.58
12/17/19	304	JPAY MEDIA W/D	000061148331	000		-	\$25.00	\$177.58
12/20/19	564	JPAY DEPOSIT	109774207	000	MANTON, MARGARETANN	+	\$30.00	\$207.58
12/23/19	162	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.85	\$206.73
12/24/19	043	CANTEEN SALES	21320191223	000		-	\$66.17	\$140.56
12/24/19	534	JPAY DEPOSIT	109924953	000	STEIN, SUSAN	+	\$100.00	\$240.56
12/26/19	669	JPAY MEDIA W/D	000061623926	000		-	\$15.00	\$225.56
12/30/19	165	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.66	\$224.90
12/30/19	812	JPAY MEDIA W/D	000061819833	000		-	\$10.00	\$214.90
12/31/19	043	CANTEEN SALES	21320191230	000		-	\$59.58	\$155.32
01/03/20	235	JPAY DEPOSIT	110328881	000	MANTON, MARGARETANN	+	\$90.00	\$245.32
01/06/20	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.60	\$244.72
01/07/20	043	CANTEEN SALES	21320200106	000		-	\$50.90	\$193.82
01/07/20	664	JPAY MEDIA W/D	000062207178	000		-	\$15.00	\$178.82
01/08/20	278	JPAY MEDIA W/D	000062259304	000		-	\$10.00	\$168.82

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ACCT#: 123101  
TYPE: INMATE TRUST

POSTED DATE	NBR	TYPE	REFERENCE NUMBER	FAC	REMITTER/PAYEE	+/-	AMOUNT	BALANCE
01/12/20	108	JPAY DEPOSIT	110675673	000	STEIN, SUSAN	+	\$200.00	\$368.82
01/13/20	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.51	\$368.31
01/14/20	043	CANTEEN SALES	21320200113	000		-	\$61.18	\$307.13
01/14/20	163	BUSINESS CHECK	1000203968	000	KINDRED SPIRITS	+	\$50.50	\$357.63
01/15/20	231	JPAY MEDIA W/D	000062653183	000		-	\$0.50	\$357.13
01/16/20	230	JPAY MEDIA W/D	000062714205	000		-	\$10.00	\$347.13
01/20/20	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$8.00	\$339.13
01/21/20	043	CANTEEN SALES	21320200120	000		-	\$0.61	\$338.52
01/21/20	176	JPAY MEDIA W/D	000062975156	000		-	\$73.99	\$264.53
01/27/20	158	PROCESSING FEE	WEEKLY DRAW	000		-	\$20.00	\$244.53
01/28/20	043	CANTEEN SALES	21320200127	000		-	\$0.74	\$243.79
02/01/20	186	JPAY DEPOSIT	111489167	000	MANTON, MARGARETANN	+	\$99.59	\$144.20
02/03/20	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$90.00	\$234.20
02/04/20	043	CANTEEN SALES	21320200203	000		-	\$1.00	\$233.20
02/10/20	161	PROCESSING FEE	WEEKLY DRAW	000		-	\$63.71	\$169.49
02/10/20	240	JPAY DEPOSIT	111877483	000	STEIN, SUSAN	+	\$0.64	\$168.85
02/10/20	259	JPAY MEDIA W/D	000064114826	000		-	\$150.00	\$318.85
02/11/20	043	CANTEEN SALES	21320200210	000		-	\$10.00	\$308.85
02/12/20	247	JPAY MEDIA W/D	000064213177	000		-	\$70.86	\$237.99
02/17/20	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$15.00	\$222.99
02/18/20	043	CANTEEN SALES	21320200217	000		-	\$0.71	\$222.28
02/19/20	277	JPAY MEDIA W/D	000064567124	000		-	\$59.64	\$162.64
02/21/20	308	JPAY MEDIA W/D	000064672439	000		-	\$8.00	\$154.64
02/24/20	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$10.00	\$144.64
02/25/20	043	CANTEEN SALES	21320200224	000		-	\$0.60	\$144.04
02/26/20	225	JPAY MEDIA W/D	000064915071	000		-	\$50.98	\$93.06
03/02/20	159	PROCESSING FEE	WEEKLY DRAW	000		-	\$10.00	\$83.06
03/02/20	254	JPAY DEPOSIT	112824954	000	MANTON, MARGARETANN	+	\$0.51	\$82.55
03/03/20	043	CANTEEN SALES	21320200302	000		+	\$90.00	\$172.55
03/03/20	289	JPAY DEPOSIT	112862837	000	STEIN, SUSAN	+	\$50.90	\$121.65
03/03/20	316	JPAY MEDIA W/D	000065211600	000		+	\$75.00	\$196.65
03/05/20	250	JPAY MEDIA W/D	000065337537	000		-	\$40.00	\$156.65
03/09/20	165	PROCESSING FEE	WEEKLY DRAW	000		-	\$25.00	\$131.65
03/10/20	229	JPAY DEPOSIT	113205276	000	STEIN, SUSAN	+	\$0.51	\$131.14
03/11/20	041	CANTEEN SALES	21320200310	000		+	\$200.00	\$331.14
03/11/20	287	JPAY MEDIA W/D	000065676917	000		-	\$82.30	\$248.84
03/13/20	228	JPAY MEDIA W/D	000065795808	000		-	\$100.00	\$148.84
03/16/20	165	PROCESSING FEE	WEEKLY DRAW	000		-	\$25.00	\$123.84
03/17/20	043	CANTEEN SALES	21320200316	000		-	\$0.82	\$123.02
03/17/20	281	JPAY MEDIA W/D	000066024159	000		-	\$78.84	\$44.18
03/20/20	317	JPAY DEPOSIT	113683554	000	MANTON, MARGARETANN	+	\$25.00	\$19.18
03/23/20	167	PROCESSING FEE	WEEKLY DRAW	000		+	\$300.00	\$319.18
03/23/20	273	JPAY DEPOSIT	113789343	000	STEIN, SUSAN	+	\$0.79	\$318.39
03/23/20	291	JPAY MEDIA W/D	000066378026	000		+	\$150.00	\$468.39
						-	\$100.00	\$368.39

IBSR140 (74)

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 TRUST FUND ACCOUNT STATEMENT  
 FOR: 11/01/2019 - 04/28/2020

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 PAGE 3

ACCT NAME: RODGERS, JEREMIAH M.  
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ACCT#: 123101  
 TYPE: INMATE TRUST

POSTED DATE	NBR	TYPE	REFERENCE NUMBER	FAC	REMITTER/PAYEE	+/-	AMOUNT	BALANCE
03/25/20	043	CANTEEN SALES	21320200324	000		-	\$86.23	\$282.16
03/30/20	165	PROCESSING FEE	WEEKLY DRAW	000		-	\$0.86	\$281.30
03/30/20	294	JPAY MEDIA W/D	000066764969	000		-	\$30.00	\$251.30
03/31/20	043	CANTEEN SALES	21320200330	000		-	\$49.54	\$201.76
04/01/20	186	JPAY DEPOSIT	114190916	000	MANTON, MARGARETANN	+	\$265.00	\$466.76
04/01/20	202	JPAY MEDIA W/D	000066860844	000		-	\$25.00	\$441.76
04/03/20	154	BUSINESS CHECK	1000373582	000	KINDRED SPIRITS	+	\$50.50	\$492.26
04/05/20	118	JPAY DEPOSIT	040320154007	000		-	\$0.50	\$491.76
04/06/20	167	PROCESSING FEE	WEEKLY DRAW	000	MANTON, MARGARETANN	+	\$30.00	\$521.76
04/06/20	278	JPAY MEDIA W/D	000067165445	000		-	\$0.50	\$521.26
04/07/20	043	CANTEEN SALES	21320200406	000		-	\$35.00	\$486.26
04/08/20	200	JPAY MEDIA W/D	000067289342	000		-	\$67.44	\$418.82
04/10/20	216	JPAY DEPOSIT	114644489	000	STEIN, SUSAN	-	\$20.00	\$398.82
04/13/20	163	PROCESSING FEE	WEEKLY DRAW	000		+	\$200.00	\$598.82
04/14/20	043	CANTEEN SALES	21320200413	000		-	\$0.67	\$598.15
04/15/20	263	JPAY MEDIA W/D	000067747975	000		-	\$77.04	\$521.11
04/19/20	120	JPAY DEPOSIT	115104880	000	STEIN, SUSAN	-	\$25.00	\$496.11
04/20/20	163	PROCESSING FEE	WEEKLY DRAW	000		+	\$200.00	\$696.11
04/21/20	043	CANTEEN SALES	21320200420	000		-	\$0.77	\$695.34
04/23/20	218	JPAY MEDIA W/D	000068391263	000		-	\$85.62	\$609.72
04/27/20	165	PROCESSING FEE	WEEKLY DRAW	000		-	\$30.00	\$579.72
04/28/20	043	CANTEEN SALES	21320200427	000		-	\$0.86	\$578.86
						-	\$82.27	\$496.59

ENDING BALANCE 04/28/20 \$496.59