

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

CHARLES E. COUGHLIN, PETITIONER

v.

UNITED STATES OF AMERICA

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

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

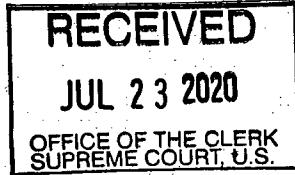
Petitioner has not previously been granted leave to proceed *in forma pauperis* in any other court.

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

Respectfully Submitted,


Charles E. Coughlin
Pro Se

340 Saint Bees Drive
Severna Park, MD 21146
(443) 370-4307
cecoughlin@comcast.net



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

I, Charles E. Coughlin, am the petitioner in the above-titled 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.

My issues on appeal are: Ineffective assistance of counsel

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	\$2601	\$0	\$2250
Self-employment	\$4248	\$0	\$0	\$0
Income from real property (such as rental income)	\$0	\$0	\$0	\$0
Interest and dividends	\$0	\$0	\$0	\$0
Gifts	\$0	\$0	\$0	\$0
Alimony	\$0	\$0	\$0	\$0
Child support	\$0	\$0	\$0	\$0
Retirement (such as social security, pensions, annuities, insurance)	\$4035	\$0	\$4035	\$0
Disability (such as social security, insurance payments)	\$0	\$0	\$0	\$0
Unemployment payments	\$1517	\$0	\$1720	\$0
Public-assistance (such as welfare)	\$0	\$0	\$0	\$0
Other (specify):	\$0	\$0	\$0	\$0
Total monthly income:	\$9800	\$2601	\$5755	\$2250

2. *List your 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
Business Services Resource Consulting LLC (Self)	340 Saint Bees Drive, Severna Park, MD 21146	1/1/2018 - Present	\$4248
			\$
			\$

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
Law Office of Steven Berger	821 W Benfield Rd #1, Severna Park, MD 21146	1/1/2018 - Present	\$2341
			\$
			\$

4. *How much cash do you and your spouse have? \$ 48*

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
Navy Federal Credit Union	Savings/Checking	\$454	\$60
Navy Federal Credit Union	Savings/Checking (business account)	\$262	\$0
Charles Schwab	Investment	\$190	\$0

If you are a prisoner seeking to appeal a judgment in a civil action or proceeding, you must attach a statement certified by the appropriate institutional officer showing all receipts, expenditures, and balances during the last six months in your institutional accounts. If you have multiple accounts, perhaps because you have been in multiple institutions, attach one certified statement of each account.

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

Home	Other real estate	Motor vehicle #1
(Value) \$962,000	(Value) N/A	(Value) \$29,832
		Make and year: VW 2019
		Model: Tiguan
		Registration #: 5EC5103 (MD)
Motor vehicle #2	Other assets	Other assets
(Value) \$23,739	(Value) N/A	(Value) N/A
Make and year: BMW 2017		
Model: X1		
Registration #: 4ED7177 (MD)		

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
NONE	\$ N/A	\$ N/A
	\$	\$
	\$	\$
	\$	\$

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

Name [or, if under 18, initials only]	Relationship	Age
Angela E. Rogers	Mother-in-law	82

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, semiannually, or annually to show the monthly rate.

	You	Spouse*
Rent or home-mortgage payment (include lot rented for mobile home)	\$3894	\$0
Are real estate taxes included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$1313	\$0
Home maintenance (repairs and upkeep)	\$338	\$0
Food	\$450	\$0
Clothing	\$200	\$0
Laundry and dry-cleaning	\$75	\$0
Medical and dental expenses	\$20	\$0
Transportation (not including motor vehicle payments)	\$288	\$0
Recreation, entertainment, newspapers, magazines, etc.	\$20	\$0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's:	\$0	\$0
Life:	\$71	\$0
Health:	\$167	\$0
Motor vehicle:	\$388	\$0
Other:	\$0	\$0
Taxes (not deducted from wages or included in mortgage payments) (specify): Business social security & Medicaid**	\$0**	\$0
Installment payments		
Motor Vehicle:	\$935	\$0
Credit card (name):	\$0	\$0
Department store (name):	\$0	\$0
Other: Court ordered restitution (\$492) & 2016 federal taxes owed (\$250)	\$742	\$0
Alimony, maintenance, and support paid to others	\$0	\$0

Regular expenses for operation of business, profession, or farm (attach detailed statement) Home office – included in entries	\$0	\$0
Other (specify): college loans (\$2230), security system monitoring (\$49), HOA (\$44)	\$2323	\$0
Total monthly expenses:*	\$11,229	\$0*

* Funds are comingled and used collectively to pay expenses so all expenses are listed under "You" column only.

** Business half of social security/Medicaid payments were \$780/month thru November 2019. No longer applicable due to no current self-employment work; therefore \$0 input for this entry.

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. I indicate "yes" for this entry as I expect income to change as I continue my job search and hope/expect to obtain employment as we and the economy recover from this pandemic.

10. *Have you spent — or will you be spending — any money for expenses or attorney fees in connection with this lawsuit?* Yes No

If yes, how much? \$ 20,000 All monies were spent on an attorney, Cheryl J. Sturm, for filing my application for COA with both the District Court and the Appellate Court. Her contact information is 387 Ring Road, Chadds Ford, PA 19317; phone: 484-771-2000; email: sturmcj@aol.com. I no longer have an attorney representing me due to lack of funds and have been designated pro se.

11. *Provide any other information that will help explain why you cannot pay the docket fees for your appeal.*

1. To put my stated average income in perspective, up to November 2019 I had an engagement with a major client and several smaller clients that provided me with a monthly average gross income of \$15,600. As a result, I was able to pay off numerous debts accrued during this lengthy legal proceeding and subsequent incarceration, including past due federal (still have approx. \$3500 remaining for 2016) and state taxes, pay for long overdue major repairs to the home (e.g. leaking foundation, patio and walkway, yard drainage, etc.), and hire an attorney as listed above. Upon completing the major engagement on November 8, 2019 and several smaller engagements since, my income dropped significantly to approximately \$600/month through March 8, 2020 when the pandemic caused that income stream to vanish. I have since received unemployment while conducting a job search.

2. During my period of unemployment we have used savings and borrowed some money from family. Those sources of funds are essentially exhausted. Given the \$600/week additional unemployment allocated due to the pandemic (resulting in \$1030/week

received) ending July 25 (payments will drop to \$430/week), money has become even more of an issue as I continue my job search.

12. *State the city and state of your legal residence.* Severna Park, MD 21146

Your daytime phone number: (443) 370-4307

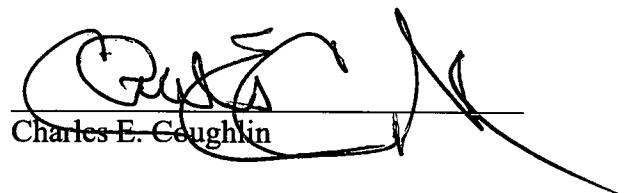
Your age: 60 *Your years of schooling:* 18

Last four digits of your social-security number: 1342

I swear or affirm under penalty of perjury under United States laws that my answers on this form are true and correct. (28 U.S.C. § 1746; 18 U.S.C. § 1621.)

Executed on: July 19, 2020

Respectfully Submitted,



Charles E. Coughlin