No. 20-

IN THE
SUPREME COURT OF THE UNITED STATES

STAFON THOMPSON,

Petitioner,

v.

STATE OF MINNESOTA,

Respondent.

On Petition for a Writ of Certiorari to the Minnesota Supreme Court

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Rachel Moran
Counsel of Record
University of St. Thomas School of Law
Legal Services Clinic
30 South 10th Street Suite 100
Minneapolis, MN 55403
(651) 962-4810
rmoran@stthomas.edu

Attorney for Petitioner

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

Petitioner has previously been granted leave to proceed *in forma pauperis* in the Minnesota Supreme Court, Hennepin County District Court, and United States District Court for the District of Minnesota.

Petitioner's affidavit or declaration in support of this motion is attached hereto. A letter from the Minnesota Public Defender's Office confirming that Mr. Thompson is indigent is also attached.

Respectfully submitted,

Rachel Moran
University of St. Thomas School of Law
Legal Services Clinic
30 South 10th Street Suite 100
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AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

I, Stafon Thompson, 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	$ 0	$ 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)	$ 0	$ 0	$ 0	$ 0
Disability (such as social security, insurance payments)	$ 0	$ 0	$ 0	$ 0
Unemployment payments	$ 0	$ 0	$ 0	$ 0
Public-assistance (such as welfare)	$ 0	$ 0	$ 0	$ 0
Other (specify): None	$ 0	$ 0	$ 0	$ 0
Total monthly income:	$ 0	$ 0	$ 0	$ 0

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
None	None	None	$ 0
None	None	None	$ 0
None	None	None	$ 0

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
None			$ None
None			$ None
None	None	None	$ None

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.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
None	$ 0	$ 0
None	$ 0	$ 0
None	$ 0	$ 0

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

☐ Home
Value None

☐ Other real estate
Value None

☐ Motor Vehicle #1
Year, make & model None
Value None

☐ Motor Vehicle #2
Year, make & model None
Value None

☐ Other assets
Description None
Value None

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	$ 0	$ 0
None	$ 0	$ 0
None	$ 0	$ 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
None	None	None
None	None	None
None	None	None

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) Are real estate taxes included? ☐ Yes ☐ No Is property insurance included? ☐ Yes ☐ No	$ 0	$ 0
Utilities (electricity, heating fuel, water, sewer, and telephone)	$ 0	$ 0
Home maintenance (repairs and upkeep)	$ 0	$ 0
Food	$ 0	$ 0
Clothing	$ 0	$ 0
Laundry and dry-cleaning	$ 0	$ 0
Medical and dental expenses	$ 0	$ 0

	You	Your spouse
Transportation (not including motor vehicle payments)	$ 0	$ 0
Recreation, entertainment, newspapers, magazines, etc.	$ 0	$ 0
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	$ 0	$ 0
Life	$ 0	$ 0
Health	$ 0	$ 0
Motor Vehicle	$ 0	$ 0
Other: None	$ 0	$ 0
Taxes (not deducted from wages or included in mortgage payments)		
(specify): None	$ 0	$ 0
Installment payments		
Motor Vehicle	$ 0	$ 0
Credit card(s)	$ 0	$ 0
Department store(s)	$ 0	$ 0
Other: None	$ 0	$ 0
Alimony, maintenance, and support paid to others	$ 0	$ 0
Regular expenses for operation of business, profession, or farm (attach detailed statement)	$ 0	$ 0
Other (specify): None	$ 0	$ 0
Total monthly expenses:	$ 0	$ 0

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: None

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

None

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

Executed on: June 30th, 2020

[signature]
(Signature)

Equal Justice

OFFICE OF THE
MINNESOTA APPELLATE PUBLIC DEFENDER

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Our File No.

April 9, 2019

Rachel Moran
Assistant Professor of Law
University of St. Thomas (MN) Law School
30 South 10th Street
Suite 100
Minneapolis MN 55403-2009

Re: State v. Stafon Edward Thompson
Hennepin County Court File No. 27-CR-08-29634

Dear Professor Moran:

Our office previously received completed eligibility forms from Stafon Thompson in the above-referenced file, and based on the information this Office was provided, we are satisfied that Mr. Thompson is personally indigent. Accordingly, pursuant to State v. Pederson, 600 N.W.2d 451 (Minn. 1999), this Office will be responsible for payment of certain costs associated with appeal, including the court reporter's bill for preparation of any transcripts for appeal as well as acquiring copies of relevant documents from the district court file for the appeal. In the event you have to order additional transcripts for this appeal, this Office will not pay at a rate higher than the normal per page rate that is allowed for transcripts ordered by this Office.

It is our office's understanding that a finding of financial eligibility for appellate public defender services is sufficient to request waiving of filing fees at the appellate courts, so please enclose a copy of this letter with your notice of appeal so the Clerk of Appellate Courts is aware of the situation.

If you need to order transcripts, you should append a copy of this letter to your order for the transcript for the court reporter's information. The defense copy of the transcript should be sent directly to this Office along with the reporter's invoice so the bill can be verified before being processed for payment. We will notify you when we have received the transcript so that arrangements can be made to have it delivered to you. We would also appreciate it if you would notify us as to the anticipated delivery date and estimated cost of the ordered transcripts when the court reporter has provided you that information.

Sincerely,
Cathryn Middlebrook
Cathryn Middlebrook
Chief Appellate Public Defender