

No. \_\_\_\_\_

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*In the Supreme Court of the United States*

\_\_\_\_\_  
MELVIN BONNELL

*Petitioner,*

v.

STATE OF OHIO,

*Respondent.*

\_\_\_\_\_  
On Petition for Writ of Certiorari to  
the Supreme Court of Ohio  
\_\_\_\_\_

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

Petitioner, Melvin Bonnell, respectfully requests leave to file the attached petition for writ of certiorari without payment of costs and to proceed *in forma pauperis*.

Bonnell is indigent, and he has been found indigent and permitted to file *in forma pauperis* in the Ohio Supreme Court and the Ohio Court of Appeals, as well as the United States District Court for the Southern District of Ohio, and the United States Court of Appeals for the Sixth Circuit in his previously filed case. Every court since Bonnell was indicted in 1987 on charges that carried the potential for the death penalty has permitted him to proceed *in forma pauperis*. Bonnell was granted appointed counsel in the state court.

Bonnell's declaration in support of this motion is attached hereto.

Respectfully submitted,

/s/ *Kimberly S. Rigby*

Kimberly S. Rigby [0078245]  
Supervising Attorney  
Death Penalty Department  
*Counsel of Record*

/s/ *Erika M. LaHote*

Erika M. LaHote [0092256]  
Assistant Public Defender

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***Counsel for Petitioner Bonnell***

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

I, Melvin Bonnell, 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>	\$ <u>-0-</u>	\$ <u>-0-</u>
Self-employment	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>
Income from real property (such as rental income)	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>
Interest and dividends	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>	\$ <u>-0-</u>
Gifts	\$ _____	\$ _____	\$ _____	\$ _____
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>

Income source	Average monthly amount during the past 12 months	Amount expected next month
Other (specify): <u>State pay</u>	\$ <u>15.<sup>xx</sup></u>	\$ <u>15.<sup>xx</sup></u>
<b>Total monthly income:</b>	\$ <u>15.<sup>xx</sup></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
<u>-</u>	<u>-</u>	<u>-</u>	\$ <u>- 0 -</u>
<u>-</u>	<u>-</u>	<u>-</u>	\$ <u>- 0 -</u>
<u>-</u>	<u>-</u>	<u>-</u>	\$ <u>- 0 -</u>

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
<u>State of Ohio</u>	<u></u>	<u></u>	\$ <u></u>
<u></u>	<u></u>	<u></u>	\$ <u></u>
<u></u>	<u></u>	<u></u>	\$ <u></u>

4. How much cash do you and your spouse have? \$ - 0 -

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
<u></u>	<u></u>	\$ <u></u>	\$ <u></u>
<u></u>	<u></u>	\$ <u></u>	\$ <u></u>
<u></u>	<u></u>	\$ <u></u>	\$ <u></u>

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

☐ Motor Vehicle #1

Year, make & model

N/A

Value \_\_\_\_\_

☐ Other real estate

Value \_\_\_\_\_

☐ Motor Vehicle #2

Year, make & model

\_\_\_\_\_

Value \_\_\_\_\_

☐ Other assets

Description N/A

Value \_\_\_\_\_

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

Person owing you or your spouse money

N/A

Amount owed to you

\$ \_\_\_\_\_

Amount owed to your Spouse

\$ \_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

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

Name

N/A

Relationship

\_\_\_\_\_

Age

\$ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\$ \_\_\_\_\_

8. Estimate the average monthly expenses of you and your family. Show separately the amount 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)	\$ - 0 -	\$ _____
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 -	\$ _____
Home maintenance (repairs and upkeep)	\$ - 0 -	\$ _____
Food	\$ - 0 -	\$ _____
Clothing	\$ - 0 -	\$ _____
Laundry and dry-cleaning	\$ - 0 -	\$ _____
Medical and dental expenses	\$ - 0 -	\$ _____
Transportation (not including motor vehicle payments)	\$ - 0 -	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	\$ - 0 -	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ - 0 -	\$ _____
Life	\$ - 0 -	\$ _____
Health	\$ - 0 -	\$ _____
Motor Vehicle	\$ - 0 -	\$ _____
Other: _____	\$ - 0 -	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ - 0 -	\$ _____
Installment payments		
Motor Vehicle	\$ - 0 -	\$ _____



	You	Your spouse
Credit card(s)	\$ <u>- 0 -</u>	\$ _____
Department store(s)	\$ <u>- 0 -</u>	\$ _____
Other: <u>N/A</u>	\$ <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>- 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? \_\_\_\_\_

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? \_\_\_\_\_

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

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

Executed on: Jan 7, 2021.

Melvin Bonnell  
(Signature)