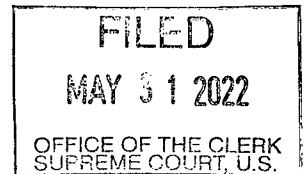


No. 21-8087

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



Zachary S. Keeter — PETITIONER
(Your Name)

VS.

United States of America — RESPONDENT(S)

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

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

Please check the appropriate boxes:

☐ Petitioner has previously been granted leave to proceed *in forma pauperis* in the following court(s):

☒ 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.

☐ Petitioner's affidavit or declaration is **not** attached because the court below appointed counsel in the current proceeding, and:

☐ The appointment was made under the following provision of law: _____
_____, or

☐ a copy of the order of appointment is appended.

Zachary S. Keeter
(Signature)

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

I, Zachary S. Keeter, 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	\$ 20	\$ 13,600	\$ 0	\$ 14,182
Self-employment	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Income from real property (such as rental income)	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Interest and dividends	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Gifts	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Alimony	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Child Support	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Retirement (such as social security, pensions, annuities, insurance)	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Disability (such as social security, insurance payments)	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Unemployment payments	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Public-assistance (such as welfare)	\$ N/A	\$ N/A	\$ N/A	\$ N/A
Other (specify): <u>Inheritance</u>	\$ 10,000	\$ N/A	\$ N/A	\$ N/A
Total monthly income:	\$ 10,020	\$ 13,600	\$ 0	\$ 14,182

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
Department of Justice	FCI Forrest City-Low	06/2021 to present	\$ 20
Bureau of Prisons	P.O. Box 7000		\$
FCI Forrest City-Low	Forrest City, AR 72336		\$

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
Polsinelli P.C.	900 W. 48th Pl. #400	6/1/1989 to present	\$ 14,182
	Kansas City, MO		\$
	64112		\$

4. How much cash do you and your spouse have? \$ 120,776
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
Checking	\$ 42	\$ 1415
Savings	\$ 15	\$ 7963
Trust Checking	\$ 138	\$ N/A
Roth IRA	2500	N/A
Trust Investments	708	110,000 401K

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

<input checked="" type="checkbox"/> Home	<input type="checkbox"/> Other real estate
Value \$183,000	Value N/A

<input checked="" type="checkbox"/> Motor Vehicle #1	<input checked="" type="checkbox"/> Motor Vehicle #2
Year, make & model 2008 Ford Fusion	Year, make & model 2003 Mitsubishi Elipse
Value \$1,650.00	Value \$650.00

☐ 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	Amount owed to you	Amount owed to your spouse
N/A	\$ N/A	\$ N/A
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
N/A	N/A	N/A
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)	\$ 0	\$ 0
Are real estate taxes included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 0	\$ 530.00
Home maintenance (repairs and upkeep)	\$ 0	\$ 100.00
Food	\$ 0	\$ 600.00
Clothing	\$ 0	\$ 100.00
Laundry and dry-cleaning	\$ 0	\$ 20.00
Medical and dental expenses	\$ 0	\$ 85.00

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 0	\$150.00
Recreation, entertainment, newspapers, magazines, etc.	\$ 0	\$100.00
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 0	\$135.00
Life	\$ 0	\$484.00
Health	\$ 0	\$125.00
Motor Vehicle	\$ 0	\$ 0
Other: <u>N/A</u>	\$ 0	\$ 0
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>N/A</u>	\$ 0	\$ 0
Installment payments		
Motor Vehicle	\$ 0	\$ 0
Credit card(s)	\$ 0	\$ 0
Department store(s)	\$ 0	\$ 0
Other: <u>401 K Loan Payments</u>	\$ 0	\$ 525.00
Alimony, maintenance, and support paid to others	\$ 0	\$ 300.00
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$ 0
Other (specify): <u>N/A</u>	\$ 0	\$ 0
Total monthly expenses:	\$ 0	\$ 1965.00

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.

See attachment

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? \$95,400 \$70,400-Bath; \$25,000 Borich

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

Thomas Bath Jr.
4000 W. 114th St. Ste 140
Leawood, KS 66211
913-652-9800

Joseph R. Borich III
4630 W. 114th St. Ste 100.
Leawood, KS 66224
913-341-1550

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? See attachment

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

See Attachment for full roster

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

I have approximately \$90,000 of outstanding student loan debt.
Inheritance was one-time, lump sum distribution. The proceeds were
used to pay the debts incurred in this case. There will be no
further distributions.

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

Executed on: May 27, 2022

Zachary S. Keeton
(Signature)

Question 9; Major Home Repairs:

Foundation Repair - \$9,500

Roof Replacement - \$14,000

Bathroom Remodel - \$5,000

Question 11:

Dr. George Savarese, PhD
Curaeta Care Systems
637 E. Golf Rd. Ste. 201
Arlington Heights, IL 60051 \$26,479
(847) 791-1950

Dr. Brian Holoyda, MD, MPH, MBA
2230 Stockton Blvd.
Sacramento, CA 95817 \$7,000
(916) 734-2614

Dr. William T. Blessing, PhD
1010 Carondelet Ste. 201
Kansas City, MO 64114 \$7,500
(816) 590-3900

Dr. Bruce Cappel, PhD
Clinical Associates, PA
8629 Bluejacket Ste. 100
Lenexa, KS 66210 (913) 677-3553 \$2,300

Dr. Stephen Peterson
428 W. 42nd St.
Kansas City, MO \$750
(816) 842-2500

John Mallory (Computer Forensics)
Mallory Technical Training and Consulting, Inc.
9393 W. 110th St. #500
Overland Park, KS \$4,250
(855) 839-9084

Zachary S. Keeter

Motion for Leave to File In Forma Pauperis Attachment