22-5915
NO. ________

In The
Supreme Court of the United States

CHARLESWORTH RAE,
Petitioner

v.

CHILDREN'S NATIONAL MEDICAL CENTER, ET AL.,
Respondent

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 previously been granted leave to proceed *in forma pauperis* on appeal by the following court:

The United States District Court for the District of Columbia. *See Petitioner's Appendix* at 52a (03/04/2021 Minute Order).

FILED
OCT 05 2022
OFFICE OF THE CLERK
SUPREME COURT, U.S.

ORIGINAL

Charlesworth Rae

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

I, Charlesworth Rae, 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	$ 3627	$ N/A	$ 5,440	$ N/A
Self-employment	$ N/A	$ N/A	$ N/A	$ N/A
Income from real property (such as rental income)	$ 0	$ N/A	$ 0	$ N/A
Interest and dividends	$ 0	$ N/A	$ 0	$ N/A
Gifts	$ 0	$ N/A	$ 0	$ N/A
Alimony	$ 0	$ N/A	$ 0	$ N/A
Child Support	$ 0	$ N/A	$ 0	$ N/A
Retirement (such as social security, pensions, annuities, insurance)	$ N/A	$ N/A	$ 0	$ N/A
Disability (such as social security, insurance payments)	$ 0	$ N/A	$ 0	$ N/A
Unemployment payments	$ 888	$ N/A	$ 0	$ N/A
Public-assistance (such as welfare)	$ 0	$ N/A	$ 0	$ N/A
Other (specify): ____________	$ 0	$ N/A	$ 0	$ N/A
Total monthly income:	$ 4,515	$ N/A	$ 5,440	$ N/A

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
Legal People	Please see attached addendum		$ 5,440
Trustpoint			$ 5,440
Innovative Driven			$ 5,440

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
N/A	N/A	N/A	$ N/A
N/A	N/A	N/A	$ N/A
N/A	N/A	N/A	$ N/A

4. How much cash do you and your spouse have? $ 12,000
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	$ 10,000	$ N/A
Savings	$ 2,000	$ N/A
	$	$ N/A

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

☐ Other real estate
Value N/A

☑ Motor Vehicle #1
Year, make & model 2006, Honda Civic Hybrid
Value 3500

☐ Motor Vehicle #2
Year, make & model N/A
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	Amount owed to you	Amount owed to your spouse
0	$ 0	$ 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
Ida Rae	Mother	95
see attachment		

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	$ 875	$ N/A
Utilities (electricity, heating fuel, water, sewer, and telephone)	$ 140	$ N/A
Home maintenance (repairs and upkeep)	$ N/A	$ N/A
Food	$ 1500	$ N/A
Clothing (Includes PUBLIC STORAGE)	$ 228	$ N/A
Laundry and dry-cleaning	$ 80	$ N/A
Medical and dental expenses	$ 300	$ N/A
Car maintenance	$ 250	

	You	Your spouse
Transportation (not including motor vehicle payments)	$ 150	$ N/A
Recreation, entertainment, newspapers, magazines, etc.	$ 30	$ N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	$ 0	$ N/A
Life	$ 116	$ N/A
Health & Dental & Eye	$ 198	$ N/A
Motor Vehicle	$ 58	$ N/A
Other:	$ N/A	$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): N/A	$ 0	$ N/A
Installment payments		
Motor Vehicle (P.S. Unable to replace 2006 Honda Civic)	$ 0	$ N/A
Credit card(s)	$ 0	$ N/A
Department store(s)	$ 0	$ N/A
Other: ~~N/A~~ Student Loan (see attached)	$ 0	$ N/A
Alimony, maintenance, and support paid to others	$	$ N/A
Regular expenses for operation of business, profession, or farm (attach detailed statement) = IT related services	$ 50	$ N/A
Other (specify): Pharmacist & Attorney REGISTRATION & CE Fees	$ 125	$ N/A
Total monthly expenses:	$ 4,100	$ N/A

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**

I have dental work scheduled to start in a few weeks provided I remain employed, which will cost me about $ 8,000 dollars out of pocket. I am planning on visiting my ailing Mother, who will be 95 years old on November 21, in Antigua from November 15, 2022 through about February 2023 to care for her (assuming I will have the opportunity to do so). I also will need to have surgery for BPH on my return to US in 2023. I am currently driving a 2006 Honda Civic Hybrid which is due for major repairs before winter, including replacement of the catalytic converter, and four tiers. I also have an outstanding hospital medical bill of $4,493 as a result of major surgery last June, which I have not been able to pay. I am paying $50 monthly towards a related bill from my surgeons (balance now is down to $1,530).

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? **No.**

11. Have you paid – or will you be paying – anyone other than an attorney (such as a paralegal or typist) any money for services in connection with this case, including the completion of this form? **Yes.**

I am using Staples to help with making copies of the required documents and scans for respondents' counsel.

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

My eldest of two sons started graduate school over a month ago and I am hoping to assist him financially with $500/month during the time he is pursuing his studies. My biggest concern at this moment , however, is coping with the increase in the prices of consumer goods and medications, since my job is temporary. Although I am enrolled in a healthcare plan, my out-of-pocket contributions are too high to keep up with regular appointments. Consequently, it would be a financial hardship for me to pay the cost for this case. **PLEASE NOTE**: My Fidelity Retirement Account balance is $217, 340; Zurich Advantage III Account balance is $41,684; and my Thrift Savings Plan Account balance is $57, 590.

Of note, my current student and parent federal loans consolidated balance is $100, 301. I will be resuming monthly payments of $71 per month beginning November 2022.

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

Executed on: October 3, 2022

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Charlesworth Rae

EMPLOYMENT HISTORY FOR THE LAST TWO YEARS

1. LegalPeople DC, 1425 K Street, NW, Suite 450, Washington, DC 20005

   Worked: 06/27/2022 to present - $5,440 gross per month

2. Trustpoint, 1025 F. Street, NW, Suite 750, Washington, DC 20004

   Worked: 11/2021 – 01/20/2022 - $ 5,440 gross per month
   Worked: 03/01/2021 – 04/13/2021 - $5,440 gross per month
   Worked: 04/25/2021 – 07/2021 - $5,440 gross per month

3. Innovative Driven (formerly Update Legal), 650 Massachusetts Ave, NW, Suite 500, Washington, DC 20001

   Worked: 03/15/2022 – 05/18/2022 - $5, 440 gross per month
   Worked: 10/30/2020 – 12/22/2020 - $ 5, 440 gross per month

4. Transperfect Legal Solutions, 700 Sixth Street, NW, DC 20001

   Worked: 10/13/2021 – 11/15/2021 - $5, 440 gross per month

5. Received Unemployment Compensation from the D.C. Department of Unemployment Services for the following time periods over the last two years:

(i) 10/03/2020 to 03/15/2021
(ii) 04/10/2021 to 04/24/2021
(iii) 07/10/2021 to 10/12/2021

6. Unemployed (Unemployment Benefits Exhausted)

   05/19/2022 – 06/27/2022