

No. 23-5382

Supreme Court, U.S.
FILED

JUL 31 2023

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

JULIE A. GRAHAM ---PETITIONER

VS.

SECRETARY, UNITED STATES DEPT. OF VETERANS AFFAIRS—
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*.

Please check the appropriate boxes:

 X Petitioner has previously been granted leave to proceed *in forma pauperis* in the following courts:

U.S. District Court for the Middle District of Pennsylvania
District Court No. 1-19-cv-01339

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

Julie A. Graham
Julie A. Graham

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

I, Julie A. Graham, 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 you estimate the average amount of money received from each of the following sources during the last 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. (Note: Affiant is not married or divorced)

Income source	Average monthly amount during the past 12 months	Amount expected next month
Employment	\$2856.00	\$1500.00
Self-employment	\$N/A	\$N/A
Income from real prop. (such as rental income)	\$N/A	\$N/A
Interest, dividends	\$N/A	\$N/A
Gifts	\$N/A	\$N/A
Alimony	\$N/A	\$N/A
Child support	\$N/A	\$N/A
Retirement (social Security, pensions, Annuities, insurance)	\$N/A	\$N/A
Disability (social Security, insurance)	\$N/A	\$N/A

Unemployment comp.	\$N/A	\$N/A
Public assistance (such As welfare)	\$N/A	\$N/A
Other (specify)	\$N/A	\$N/A
<hr/>		
Total monthly income	\$2856.00	\$1500.00

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
VA Medical Center	5070 Ritter Rd.	2011-present	\$2287.20

3. How much cash do you have? \$ ZERO
Below, state any money you have in bank accounts or in any other financial institution.

Type of account (e.g. checking or savings)	Amount you have
<u>NONE</u>	<u>ZERO</u>

4. List the assets, and their values, which you own, Do not list clothing and ordinary household furnishings.

<u> </u> Home	<u> </u> Other real estate
Value \$ <u> </u>	Value \$ <u> </u>

X Motor vehicle #1
Year, make & model: 2016 Honda CRV (80,000+ miles on vehicle)
Value \$16,000 (\$13,000 owed on vehicle)

 Other assets
Description N/A
Value \$N/A

5. State every person, business or organization owing you money, and the amount owed

**Person owing
you money**

Amount owed to you

NONE

\$ ZERO

6. State persons who rely on you for support

NONE

7. Estimate average monthly expenses of you. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate

Rent or mortgage payment \$N/A
(include lot rent for mobile home)

Are real estate taxes included? ☐ Yes ☒ No

Is property insurance included? ☐ Yes ☒ No

Utilities (electricity, heating fuel, water, sewer, telephone) \$130

Home maintenance (repairs, upkeep) \$1000

Food \$500

Clothing \$500

Laundry, dry-cleaning \$N/A

Medical, dental expenses \$500

Transportation (not including motor vehicle payments) \$160

Recreation, entertainment, newspapers, Magazines, social media \$200

Insurance (not deducted from wages or included in mortgage payments)

Homeowner's or renter's \$N/A

Life insurance \$100

Health insurance \$200
Motor vehicle \$75
Other N/A_____ \$N/A_____

Taxes (not deducted from wages or
Included in mortgage payments)
(specify NONE) \$N/A_____

Installment payments

Motor vehicle \$320
Credit card(s) \$N/A_____

Department store(s) \$N/A_____

Other N/A_____ \$N/A_____

Alimony, maintenance, support
paid to others \$N/A_____

Other (specify) N/A \$N/A_____

8. Do you expect any major changes to your monthly income or expenses or to your assets or liabilities during the next 12 months?

NO

9. 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

10. 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?


NO

11. Provide any other information that will help explain why you

Ever since the ongoing problem with my employer, the Veterans Administration, began over four years ago, I have suffered from a psychological condition which has been diagnosed as posttraumatic stress disorder. It started with the feelings I had after being charged with three or four serious crimes (one which doesn't even exist as a crime in Pennsylvania) all connected with the fact that I was a person infected with HIV. I had done nothing wrong, yet it took me over a year to have the crimes disposed of and totally expunged from my record (although I still cannot get the veterans administration to remove information about my criminal arrest from my personnel record). After I returned to work following my indefinite suspension, I continued to suffer from episodes of PTSD which includes psychological distress which can be intense and disabling, with the result that I have to call off work because of the alteration in cognition and mood which makes it impossible to perform my normal work activities. Every time the authorities find against me, another episode occurs and I miss work, need to increase my psychotherapy, medication, even undergo hospitalization. I have lost, and continue to lose, wages as a result of my condition. And my medical expenses continue to be abnormally high.

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

Executed on July 31, 2023,


Julie A. Graham