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NO. 23-\_\_\_\_\_

**ORIGINAL**

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IN THE  
**Supreme Court of the United States**

FILED  
NOV 29 2023  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

JENNIFER L DEES,

PETITIONER,

V.

THE PEOPLE OF THE STATE OF COLORADO,

RESPONDENT.

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
COLORADO SUPREME COURT

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PETITION FOR WRIT OF CERTIORARI

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

Pursuant to Supreme Court Rule 39, the Petitioner, Jennifer L. Dees, pro-se, requests that the Court grant her leave to proceed in forma pauperis. In support of this Motion, the Petitioner avers that:

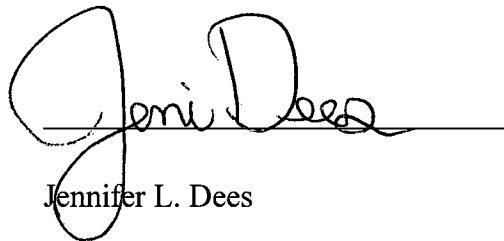
1. Petitioner is unable to afford the cost of representation in this matter.
2. Petitioner's affidavit or declaration in support of this motion is attached hereto!

**RECEIVED**  
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SUPREME COURT, U.S.

3. Petitioner proceeded below in Jefferson County Court, District Court for her appeal and the Colorado Supreme Court with court appointed counsel, appointed pursuant to C.R.S. Section 21-1-103 - Representation of indigent persons.

WHEREFORE, the petitioner, JENNIFER L. DEES, pro-se, respectfully requests that she be allowed to proceed in forma pauperis without payment of filing fees or service of notice fees, and for such other relief as the Court deems just and proper.

Respectfully submitted this 29th day of November 2023

A handwritten signature in black ink, appearing to read "Jeni Dees", is written over a horizontal line. The signature is stylized with a large, looping initial "J".

Jennifer L. Dees

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**ORDER REGARDING MOTION TO PROCEED**  
**IN FORMA PAUPERIS ON WRIT**

The court has considered the appellant's motion to proceed in forma pauperis on writ:

IT IS ORDERED that the motion be \_\_\_\_\_.

Washington DC, this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

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JUSTICE

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

I, JENNIFER L. DEES, 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>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Self-employment	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Income from real property (such as rental income)	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Interest and dividends	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Gifts	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Alimony	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Child Support	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Disability (such as social security, insurance payments)	\$ <u>1418.<sup>00</sup></u>	\$ <u>—</u>	\$ <u>1418.<sup>00</sup></u>	\$ <u>—</u>
Unemployment payments	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Public-assistance (such as welfare)	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
Other (specify): <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>	\$ <u>—</u>
<b>Total monthly income:</b>	\$ <u>1418.<sup>00</sup></u>	\$ <u>—</u>	\$ <u>1418.<sup>00</sup></u>	\$ <u>—</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
N/A	—	—	\$ —
			\$
			\$

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	—	—	\$ —
			\$
			\$

4. How much cash do you and your spouse have? \$ 100.<sup>00</sup>  
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 Account	\$ 100. <sup>00</sup>	\$ 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 \_\_\_\_\_

☐ Other real estate  
Value \_\_\_\_\_

☒ Motor Vehicle #1  
Year, make & model 2012 BUICK ENCLAVE  
Value \_\_\_\_\_

☐ Motor Vehicle #2  
Year, make & model \_\_\_\_\_  
Value \_\_\_\_\_

☐ Other assets  
Description \_\_\_\_\_  
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	\$ _____	\$ _____
	\$ _____	\$ _____
	\$ _____	\$ _____

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
LD	SON	12

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)	\$ 700.00	\$ _____
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)	\$ 150.00	\$ _____
Home maintenance (repairs and upkeep)	\$ _____	\$ _____
Food	\$ 350.00	\$ _____
Clothing	\$ 50.00	\$ _____
Laundry and dry-cleaning	\$ _____	\$ _____
Medical and dental expenses	\$ 100.00	\$ _____

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>50</u>	\$ <u>1</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>1</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>1</u>	\$ <u>1</u>
Life	\$ <u>1</u>	\$ <u>1</u>
Health	\$ <u>1</u>	\$ <u>1</u>
Motor Vehicle	\$ <u>50</u>	\$ <u>1</u>
Other: _____	\$ <u>1</u>	\$ <u>1</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>1</u>	\$ <u>1</u>
Installment payments		
Motor Vehicle	\$ <u>1</u>	\$ <u>1</u>
Credit card(s)	\$ <u>1</u>	\$ <u>1</u>
Department store(s)	\$ <u>1</u>	\$ <u>1</u>
Other: _____	\$ <u>1</u>	\$ <u>1</u>
Alimony, maintenance, and support paid to others	\$ <u>1</u>	\$ <u>1</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>1</u>	\$ <u>1</u>
Other (specify): _____	\$ <u>1</u>	\$ <u>1</u>
<b>Total monthly expenses:</b>	\$ <u>1450.00</u>	\$ <u>1</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? \_\_\_\_\_

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

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

I am on SSDI and have been since 2007.

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

Executed on: NOVEMBER 29, 2023

STATE OF NEW YORK  
COUNTY OF Saratoga

On the 29 day of November, 2023, before me personally came Jennifer Lynn Dees, to me known to be the individual described in, and who executed, the foregoing instrument, and acknowledged that he/she executed the same.

[Signature]  
Notary Public

[Signature]  
(Signature)  
Michael R Cahill Jr.  
Notary Public, State of New York  
Qualified in Albany County  
No. 01CA6389832  
Commission Expires April 8, 2027