

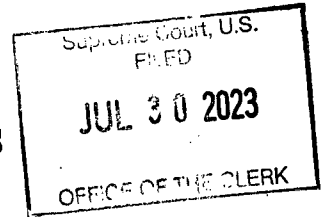
ORIGINAL

No. _____

23-6344

IN THE

SUPREME COURT OF THE UNITED STATES



Michael Broome — PETITIONER
(Your Name)

VS.

State of Delaware — RESPONDENT(S)
Sean P. Lugg Esq.

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):

Delaware Superior and Supreme court

☐ Petitioner has **not** previously been granted leave to proceed *in forma pauperis* in any other court.

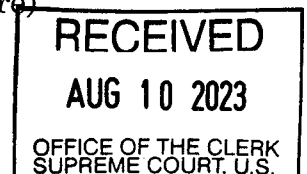
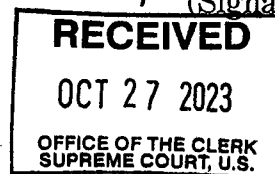
☐ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ 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.

[Signature]
(Signature)



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

I, Michael Browner, 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	\$ ~5.00	\$ 0	\$ 0	\$ 0
Self-employment	\$ 0	\$ 0	\$ 0	\$ 0
Income from real property (such as rental income)	\$ 0	\$ 0	\$ 0	\$ 0
Interest and dividends	\$ 0	\$ 0	\$ 0	\$ 0
Gifts	\$ ~100	\$ 0	\$ ~100	\$ 0
Alimony	\$ 0	\$ 0	\$ 0	\$ 0
Child Support	\$ 0	\$ 0	\$ 0	\$ 0
Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ 0	\$ 0	\$ 0
Disability (such as social security, insurance payments)	\$ 0	\$ 0	\$ 0	\$ 0
Unemployment payments	\$ 0	\$ 0	\$ 0	\$ 0
Public-assistance (such as welfare)	\$ 0	\$ 0	\$ 0	\$ 0
Other (specify): _____	\$ 0	\$ 0	\$ 0	\$ 0
Total monthly income:	\$ ~100	\$ 0	\$ ~100	\$ 0

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
James T. Vaughn	1181 Paddock Rd.	10/22 - 12/22	\$ 0
		~ 4/23 - 5/23	\$ ~5
			\$

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
			\$
			\$

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.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
N/A	\$ 0	\$ 0
	\$	\$
	\$	\$

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 N/A
Value

☐ 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

\$ 0

\$ _____

\$ _____

\$ _____

\$ _____

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

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? ☐ Yes ☐ No

Is property insurance included? ☐ Yes ☐ No

Utilities (electricity, heating fuel,
water, sewer, and telephone)

\$ 0

\$ 0

Home maintenance (repairs and upkeep)

\$ 0

\$ 0

Food

\$ ~100

\$ 0

Clothing

\$ ~10

\$ 0

Laundry and dry-cleaning

\$ ~50

\$ 0

Medical and dental expenses

\$ 0

\$ 0

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>0</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>~10</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Credit card(s)	\$ <u>0</u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: <u>N/A</u>	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): <u>N/A</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly expenses:	\$ <u>~100</u>	\$ <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? 0

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? 0

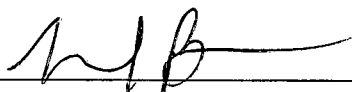
If yes, state the person's name, address, and telephone number:

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

Im incarcerated and unemployed

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

Executed on: July 11th, 2023


(Signature)

JAMES T VAUGHN CORRECTIONAL CENTER
SUPPORT SERVICES OFFICE
MEMORANDUM

TO: Michael Broomer

SBI #: 00696466

FROM: JTVCC Support Services/Business Office- Inmate Accounts

RE: **6 month / Average Daily Balance Statement**

DATE: January 14, 2022

Attached are copies of your inmate account statements for the months of

July 2021 to January 2022.

Average daily balance/ 6 months: \$90.96

Department of Correction Certified Statement

I hereby certify that the appellant named herein has the sum of \$ 163.91 on account to the appellant's credit at the institution where the appellant is confined. I further certify that the appellant has the following securities to the appellant's credit according to the institution's records:

N/A

Kayla Dabe 1/14/22
Designee/Date

Jennie Ann Kinsey 1/14/22
Notary/Date

Attachments

Cc: File

JENNIE ANN KINSEY
NOTARY PUBLIC
STATE OF DELAWARE
My Commission Expires Upon Office

Delaware Department of Correction

Inmate Account Statement

Run Date: 01/14/2022 11:16 AM

Location: JTVCC
Period From: 07/14/2021 To 01/14/2022

Account #: 00696466 Name: BROOMER MICHAEL D Current Location / Housing: JTVCC / Bldg 17 Tier D

As of 07/14/2021 Opening Balance: \$80.34 As of 07/14/2021 Opening Available Balance*: \$80.34

Transaction#	Transaction Date	Transaction Description	Check# / Money Order#	Debit	Credit	Hold Amount	Available Balance	Memo, From/To
2898853	07/20/2021	Visit Cash(GTL)			\$19.00	\$0.00	\$99.34	BROWN FRED
2907912	07/29/2021	Commissary	177472	\$81.29		\$0.00	\$18.05	JTVCC Commissary
2910026	08/02/2021	Mobile Credit Card(GTL)	8269		\$45.00	\$0.00	\$63.05	Walker Olivia
2912009	08/03/2021	Mobile Credit Card(GTL)	3271		\$100.00	\$0.00	\$163.05	Aikens Norman
2923599	08/13/2021	Commissary	178195	\$110.30		\$0.00	\$52.75	JTVCC Commissary
2924801	08/16/2021	Mobile Credit Card(GTL)	3271		\$100.00	\$0.00	\$152.75	Aikens Norman
2938411	08/30/2021	Commissary	178491	\$49.47		\$0.00	\$103.28	JTVCC Commissary
2948634	09/08/2021	Postage	178859	\$1.36		\$0.00	\$101.92	8/29/21,JTVCC Commissary
2953191	09/13/2021	Commissary	179057	\$93.08		\$0.00	\$8.84	JTVCC Commissary
2954299	09/14/2021	Mobile Credit Card(GTL)	3271		\$100.00	\$0.00	\$108.84	Aikens Norman
2961941	09/21/2021	Postage	179227	\$1.76		\$0.00	\$107.08	09/18/21,JTVCC Commissary
2963639	09/23/2021	Commissary	179431	\$49.69		\$0.00	\$57.39	JTVCC Commissary
2968784	09/29/2021	Commissary	179431		\$19.48	\$0.00	\$76.87	refund,JTVCC Commissary
2969462	09/29/2021	Postage	179432	\$1.56		\$0.00	\$75.31	9/26/21,JTVCC Commissary
2977690	10/06/2021	Postage	179657	\$0.53		\$0.00	\$74.78	10/06/21,JTVCC Commissary
2979742	10/08/2021	Commissary	179913	\$72.60		\$0.00	\$2.18	JTVCC Commissary
2982825	10/12/2021	Mobile Credit Card(GTL)	3271		\$100.00	\$0.00	\$102.18	Aikens Norman
2989829	10/19/2021	IEC-Special Olympics	180966	\$8.00		\$0.00	\$94.18	Special Olympics Chick-Fil-A,JTVCC Commissary
2989830	10/19/2021	IEC-Special Olympics	180966	\$31.25		\$0.00	\$62.93	Special Olympics Chick-Fil-A,JTVCC Commissary
2993499	10/22/2021	Commissary	180255	\$8.11		\$0.00	\$54.82	JTVCC Commissary
2999661	10/27/2021	Postage	180257	\$0.53		\$0.00	\$54.29	10/20/21,JTVCC Commissary
2999662	10/27/2021	Postage	180257	\$0.53		\$0.00	\$53.76	10/20/21,JTVCC Commissary
3006654	11/03/2021	Postage	180467	\$0.73		\$0.00	\$53.03	11/02/21,JTVCC Commissary
3010441	11/08/2021	Commissary	180630	\$9.54		\$0.00	\$43.49	JTVCC Commissary
3014319	11/10/2021	Postage	180852	\$0.53		\$0.00	\$42.96	11/2/21,JTVCC Commissary
3014320	11/10/2021	Postage	180852	\$0.53		\$0.00	\$42.43	11/2/21,JTVCC Commissary
3014444	11/10/2021	Postage	180852	\$0.53		\$0.00	\$41.90	11/7/21,JTVCC Commissary
3014508	11/10/2021	Postage	180852	\$0.73		\$0.00	\$41.17	11/9/21,JTVCC Commissary
3021061	11/17/2021	Postage	180852	\$1.36		\$0.00	\$39.81	11/14/21,JTVCC Commissary
3021855	11/18/2021	Mobile Credit Card(GTL)	3271		\$40.00	\$0.00	\$79.81	Aikens Norman
3022654	11/19/2021	Commissary	180965	\$6.08		\$0.00	\$73.73	JTVCC Commissary

Delaware Department of Correction

Run Date: 01/14/2022 11:16 AM

Inmate Account Statement

Location: JTVCC

Period From: 07/14/2021 To 01/14/2022

Account #: 00696466

Transaction#	Transaction Date	Transaction Description	Check# / Money Order#	Debit	Credit	Hold Amount	Available Balance	Memo, From/To
3031260	11/29/2021	Pay-To	181028	\$11.00		\$0.00	\$62.73	4 THE PACK ENTERTAINMENT LLC
3031578	11/30/2021	Mobile Credit Card(GTL)	3271		\$200.00	\$0.00	\$262.73	Aikens Norman
3033799	12/01/2021	Postage	181191	\$0.53		\$0.00	\$262.20	11/24/21,JTVCC Commissary
3034017	12/01/2021	Postage	181191	\$0.53		\$0.00	\$261.67	11/30/21,JTVCC Commissary
3037244	12/06/2021	Commissary	181376	\$189.22		\$0.00	\$72.45	JTVCC Commissary
3038483	12/06/2021	Pay-To	181233	\$20.00		\$0.00	\$52.45	4 THE PACK ENTERTAINMENT LLC
3040833	12/08/2021	Postage	181378	\$0.53		\$0.00	\$51.92	11/30/21,JTVCC Commissary
3041045	12/08/2021	Postage	181378	\$1.16		\$0.00	\$50.76	12/7/21,JTVCC Commissary
3041263	12/08/2021	Commissary			\$2.76	\$0.00	\$53.52	refund,JTVCC Commissary
3050517	12/17/2021	Commissary	181727	\$9.57		\$0.00	\$43.95	JTVCC Commissary
3054809	12/21/2021	Mobile Credit Card(GTL)	8263		\$25.00	\$0.00	\$68.95	Daniel Claudette
3055417	12/21/2021	Postage	181722	\$0.53		\$0.00	\$68.42	12/14/21,JTVCC Commissary
3055599	12/21/2021	Postage	181722	\$1.36		\$0.00	\$67.06	12/15/21,JTVCC Commissary
3063044	12/29/2021	Postage	182022	\$1.36		\$0.00	\$65.70	12/21/21,JTVCC Commissary
3067398	01/04/2022	Commissary	182018	\$9.84		\$0.00	\$55.86	JTVCC Commissary
3069393	01/06/2022	Web Payment Credit Card(GTL)	8209		\$100.00	\$0.00	\$155.86	Broomer Avis
3072161	01/10/2022	Commissary	182248		\$9.21	\$0.00	\$165.07	refund,JTVCC Commissary
3076861	01/12/2022	Postage	182241	\$1.16		\$0.00	\$163.91	1/10/22,JTVCC Commissary

Total: \$776.88 \$860.45

As of 01/14/2022 Current Balance: \$163.91 Available Balance*: \$163.91

Total Amount on Hold As of 01/14/2022:	Facility	Medical Copay	Legal	Restitution	Indigent	Room and Board	Others	Court Fees
	JTVCC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
	HRICI	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00