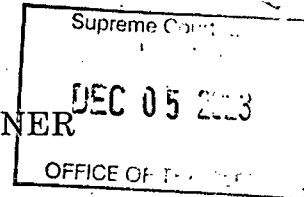


23-7074
No. 123, 2023

154, 2023

IN THE
SUPREME COURT OF THE UNITED STATES

Venus Moore — PETITIONER
(Your Name)



State of Delaware
Merit Employee Relations Board
and Department of Health and
Social Services, Division of Management Services VS.
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.

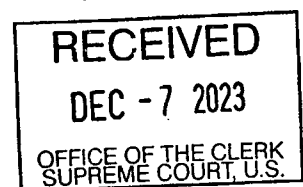
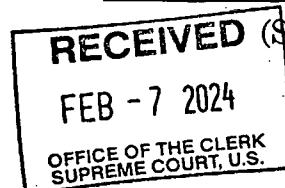
☐ Petitioner's affidavit or declaration in support of this motion is attached hereto.

☐ 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.

Venus Moore



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

I, Venus Moore, 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	\$ 0	\$ NA	\$	\$
Self-employment	\$ 0	\$ 0	\$	\$
Income from real property (such as rental income)	\$ 0	\$ 0	\$	\$
Interest and dividends	\$ 0	\$ 0	\$	\$
Gifts	\$ 0	\$ 0	\$	\$
Alimony	\$ 0	\$ 0	\$	\$
Child Support	\$ 1,268.00	\$ 0	\$	\$
Retirement (such as social security, pensions, annuities, insurance)	\$ 0	\$ 0	\$	\$
Disability (such as social security, insurance payments)	\$ 3,737.85	\$ 0	\$	\$
Unemployment payments	\$ 0	\$ 0	\$	\$
Public-assistance (such as welfare)	\$ 0	\$ 0	\$	\$
Other (specify):	\$ 0	\$ 0	\$	\$
Total monthly income:	\$ 5,005.85	\$ 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
Centurion (DOC)	23203 Dupont Blvd Georgetown DE 19947	2/2023 - 5/2023	\$ 2,038.00 Weekly
Seaford School District	500 E. Stein Hwy Seaford DE	2/2022 - 10/2022	\$ 1,125.00 Biweekly
Fairfax County School District	5709 Popkins Ln Alexandria VA	9/2022 - 9/30/2022	
DHSS/DMS	252 Chapman Road Newark DE 19702	5/29/2014 - 2/1/2020	

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
			\$
			\$
			\$

4. How much cash do you and your spouse have? \$
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
Savings \$800.00 M&T Checking	\$ 290.00	\$ NA
Savings \$500.00 Navy Federal Checking	\$ - 300.45	\$ /
Woodforest Checking	\$ - 506.00	\$ /
Savings \$115.00		

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

☒ Home
Value 353,000

☐ Other real estate
Value _____

☒ Motor Vehicle #1
Year, make & model 2016 Audi A4
Value 11,500.00

☒ Motor Vehicle #2
Year, make & model 2016 Town & Country VAN
Value 10,000

☐ 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

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
<u>Joshua McCauley</u>	<u>Son</u>
_____	_____
_____	_____

Age (Son has 20 Autism)
I have guardianship that is court ordered

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.

Rent or home-mortgage payment (include lot rented for mobile home)

You

Your spouse

\$ 1,710.00

\$ N/A

Are real estate taxes included? ☒ Yes ☐ No

Is property insurance included? ☒ Yes ☐ No

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

\$ 550.00

\$ _____

Home maintenance (repairs and upkeep)

\$ 250.00

\$ _____

Food

\$ 300.00

\$ _____

Clothing

\$ 0

\$ _____

Laundry and dry-cleaning

\$ 50.00

\$ _____

Medical and dental expenses

\$ 0

\$ _____

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>N/A</u>
Recreation, entertainment, newspapers, magazines, etc. ^{TV} →	\$ <u>218.00</u>	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ _____	\$ _____
Life ^{See mortgage statement} → Paid by VA monthly	\$ <u>42.00</u>	\$ _____
Health → Paid by VA	\$ <u>0</u>	\$ _____
Motor Vehicle monthly for 2 vehicles	\$ <u>415.00</u>	\$ _____
Other: _____	\$ <u>0</u>	\$ _____
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>See Mortgage statement</u>	\$ _____	\$ _____
<u>Exempt from some taxes</u>		
Installment payments		
Motor Vehicle	\$ <u>681.00</u>	\$ _____
Credit card(s)	\$ <u>100.00</u>	\$ _____
Department store(s)	\$ <u>0</u>	\$ _____
Other: <u>Loan Mart</u>	\$ <u>209.00</u>	\$ _____
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ _____
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ _____
Other (specify): <u>ADT</u>	\$ <u>72.76</u>	\$ _____
Total monthly expenses:	\$ <u>4,555.76</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? \$ 7,500.00 to 8,000.00

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

Allen and Associates
4250 Lancaster Pike (STE 230)
Wilmington DE 19805 (302) 234-8600

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? \$500.00 consultation meeting

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

The Poliquin Firm
(302) 702-5501

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

At this time I am receiving VA Compensation due to service connected condition(s)

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

Executed on: December 5, 2023

Venus Moore

(Signature)