

23-7400
NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

LESLIE J. REYNARD

Petitioner,

v.

WASHBURN UNIVERSITY OF TOPEKA

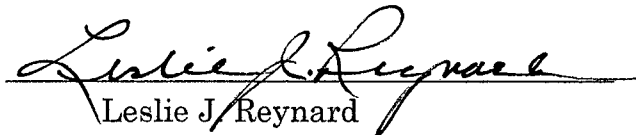
Respondent.

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

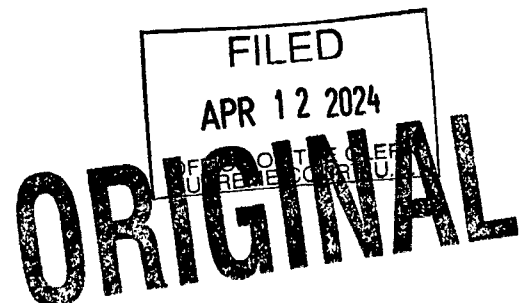
Petitioner *pro se* asks leave to file the attached Petition for a Writ of Certiorari without prepayment of costs and to proceed *in forma pauperis*.

Petitioner *pro se* was granted leave to proceed *in forma pauperis* in the US District Court for the District of Kansas, Case. No. 5:19-cv-04012-HLT-TJJ.

Petitioner's sworn affidavit in support of this Motion is attached hereto.



Leslie J. Reynard
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Lawrence, KS 66047
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Phone 618-616-7379
Petitioner, Pro Se



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

I, Leslie J. Reynard, 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	*(*) \$ 1600-	\$ 0	* \$ 1600-
Self-employment	\$ 550-	\$ 0	\$ 200-	\$ 0
Income from real property (such as rental income)	\$ 0	\$ 0	\$ 0	\$ 0
Interest and dividends	\$ 0	\$ 0	\$ 0	\$ 0
Gifts	\$ 0	\$ 0	\$ 0	\$ 0
Alimony	\$ 0	\$ 0	\$ 0	\$ 0
Child Support	\$ 0	\$ 0	\$ 0	\$ 0
Retirement (such as social security, pensions, annuities, insurance)	\$ 2408-	\$ 2870-	\$ 2408	\$ 2870-
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): ^{IRA} <u>withdrawals</u>	\$ 292- \$ 692-	\$ 0	\$ 0	\$ 0
Total monthly income:	\$ 3942-	\$ 4470-	\$ 2608-	\$ 4470-

(*) Please see attached sheet.)

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	N/A	N/A	\$ 0
N/A	N/A	N/A	\$ 0
N/A	N/A	N/A	\$ 0

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
* SKEEBA STUDIOS INC.	791 E. 1217 RD.	1975-present	* \$ 1600- (draw)
---	LAWRENCE, KS	N/A	\$ N/A
---	66646	N/A	\$ N/A

4. How much cash do you and your spouse have? \$ 19,350 (spouse) \$ 925- (self)
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
Personal Checking Accts.	\$ 925-	\$ 3,500-
N/A (SAVINGS ACCTS.)	\$ N/A	\$ N/A
* IRAS (TINA + BANK-SELF) (BANK-SPOUSE)	\$ 55,000 + \$ 8500	\$ 16,000-

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

* Home
Value \$ 385,000-

* Other real estate - SPOUSE'S CORPORATION IS OWNER
Value \$ 35,000-

* Motor Vehicle #1
Year, make & model 2005 Toyota Corolla
Value \$ 4800-

* Motor Vehicle #2
Year, make & model 2003 Toyota Tundra
Value \$ 3500-

* Other assets (A) SPOUSE - ARTIST'S TOOLS + MATERIALS (B) SELF - SCHOLAR / WRITER TOOLS + MATERIALS (i.e., COMPUTER, LIBRARY)
Value (A) \$ 15,000 (B) \$ 5,000-

(* Please see attached sheet.)

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

IRS TAX REFUNDS

\$ 9,200- (ESTIMATE)

\$ N/A

(*) CENTER for APPLIED ON RESEARCH (LOAN)

\$ 3,500-

\$ N/A

(*) SKEEBA STUDIOS, INC. (LOAN)

\$ N/A

\$ 45,000-

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
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

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)	\$ <u>0</u>	\$ <u>1428-</u>
Are real estate taxes included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>700-</u>	\$ <u>85-</u>
Home maintenance (repairs and upkeep)	\$ <u>30-</u>	\$ <u>150-</u>
Food	\$ <u>650-</u>	\$ <u>0</u>
Clothing	\$ <u>75-</u>	\$ <u>50-</u>
Laundry and dry-cleaning	\$ <u>30-</u>	\$ <u>0</u>
Medical and dental expenses	\$ <u>300-</u>	\$ <u>350-</u>

(*) Please see attached sheet.)

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 70	\$ 250-
Recreation, entertainment, newspapers, magazines, etc.	\$ 150-	\$ 100-
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 0	\$ 0
Life	\$ 145-	\$ 230-
Health	\$ 550.-	\$ 1020-
(*) Motor Vehicle	(*) \$ (A) 104- (B) 99-	(*) \$ (A) 126- (B) 162-
Other: N/A	\$ N/A	\$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): (A) IRA DISTRIBUTIONS	(A) \$ 65-	(A) 0
(B) AUTO PERSONAL PROPERTY	(B) \$ 45-	(B) 78-
Installment payments		
Motor Vehicle	\$ 0	\$ 0
Credit card(s)	(*) \$ 1300-	\$ 200-
Department store(s)	\$ 150-	\$ 0
Other: 0 - N/A	\$ 0	\$ 0
Alimony, maintenance, and support paid to others	\$ 0	\$ 0
Regular expenses for operation of business, profession, or farm (attach detailed statement) (*)	\$ 0	\$ 0
Other (specify): N/A	\$ 0	\$ 0
Total monthly expenses:	\$ 3813-	\$ 4229-

(*) Please see attached sheet.)

- (*) 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? N/A

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

N/A

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? \$375 - (estimate)

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

FOR COPYING and DELIVERY TO SUPREME COURT:
(A) COPYCO. (B) USPS or UPS STORE (LAWRENCE, KS)
540 FIRESIDE COURT
LAWRENCE, KS 66049
785-832-2679

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

(Attached)

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

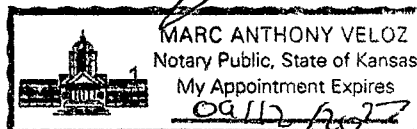
Executed on: March 29, 2024

STATE OF KANSAS } SS.
COUNTY OF DOUGLAS }

NOTARY PUBLIC: Marc Anthony Veloz

Leslie J. Reynolds
(Signature)

(*) Please see attached sheet.)



[see #3, p.2, Spouse Employer]

Skeeba Studios, Inc. is my husband's corporation. He is a sculptor. Due to his own health issues, the pandemic, and escalating inflation of bronze and other materials and transportation, he had to make a loan to the corporation. He is not taking a salary at this time, rather a draw of about \$1600 monthly. The corporation has not yet made repayments on the loan.

[see #4, p.2, Type of Account]

The IRA balances remaining after distributions noted above as "income" are set out here.

[see #5, p.2, Assets and #8, p.4]

Other Real Estate: Skeeba Studios, Inc. owns the acreage listed here and his "tools of the trade."

Motor Vehicles: Our personal vehicles are listed here (Toyota Celica and Toyota Tundra truck). However two other vehicles are owned by Skeeba Studios, Inc. and Hawk & Wren, LLC.:

- 2002 Cadillac Escalade (owned by Skeeba Studios, Inc.). Value -- \$3000
- 2005 Mini-Cooper (owned by Hawk & Wren, LLC). Value -- \$4900

[see #5, p.2, Other Assets]

My spouse's artist's tools and materials are the property of Skeeba Studios, Inc

Additional "Assets" Information:

- My husband and I established an LLC for a country guest house on our property (*The Hawk and Wren*). We had planned to have that up and running last year but have been unable to move forward due to medical and financial issues described herein. No income yet. Regular expenses currently are auto-related (insurance, taxes)
- In 2019, I established a Kansas corporation that was to be a lobbying firm, but in I 2024 amended its name to reflect its current focus on research and publishing (*Center Research / Center Publishing, Inc.*) No income yet. Current expenditures are for filing documents, possible taxes, and research materials.

[see #6, p.3, Monies Owed to Myself and Spouse]

I anticipate receiving IRS refunds on federal income taxes paid between 2020 and the present; these will be used to reduce credit card debt and a loan against my life insurance.

I recently loaned my corporation (Center for Applied CN Research, Inc. – name recently amended to Center Research / Center Publishing, Inc.) funds so that I can begin publishing and marketing of my work, as well as to establish a website. The funds I used for this loan were part of my IRA withdrawals.

9 (p. 4): Do you expect any major changes to your monthly income or expenses or in your assets or liabilities in the next 12 months?

My finances will change either to become *much better* or *much worse* this year. Losing my job / income three years ago coincided with medical crises that have left me (currently) disabled and unable to work.

Since then, to keep current with living expenses has resulted in card debt of over \$15,000. This has required withdrawals from my already-small TIAA and IRA accounts. [see #1, p.1, *Other*] Nearly half of my retirement savings have been depleted in less than three years.

We are planning major changes to conserve our remaining assets, especially if I remain unable to work due to health issues described below.

LESLIE J. REYNARD. Addendum: Affidavit in Support of Motion for Leave to Proceed IFP

- In March 2020, my husband was diagnosed with Stage IV esophageal cancer. He has had to delay projects, extend completion dates, and decline new work, an unexpected income reduction.
- In 2015 and 2015, I took two FMLA leaves to manage health issues including fibromyalgia, ME/CFS, ("chronic fatigue syndrome") and RCVS ("reversible cerebral-vascular syndrome").
- In 2020-21, I had COVID twice; in October 2022, I was diagnosed with long COVID syndrome.
- In November 2021, I was diagnosed with appendix cancer and underwent surgery.
- Ongoing surveillance for this cancer revealed a second cancer (Stage III adenocarcinoma, colon) in December 2023.
- I underwent colon resection surgery on February 14, 2024. I will begin chemotherapy in mid-April.
- There are extreme fatigue and cognitive issues associated with ME/CFS, fibromyalgia, long COVID, and two forms of cancer, and this leaves me bedridden much of each day.
- I have had to decline or postpone several viable income-producing opportunities since 2021; several of these remain strong possibilities if my health improves.

12 (p. 5):

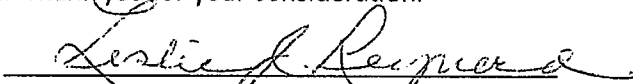
My monthly expenses exceed my income – which is currently \$0 due to the health issues I am managing. Prior to my job loss and more serious illnesses which coincided in 2021, I was able to pay bills and put money aside for retirement. If the job loss and the illnesses had not occurred together, I would have probably been able to continue with finances somewhat in the black – at least having some time to plan and reconnoiter. However, both crises together have caused me to incur large interest-bearing credit card debt during the period of optimism I had prior to 2023.

Please note that although I am married, my spouse is not a party to this litigation and is not providing financial support. We have never commingled assets, filed joint tax returns, or shared bank accounts. I do not have access to my husband's tax, employment, and financial records. He provided information in this Affidavit based on recent tax returns, real estate records, and best estimates. The information provided for my spouse primarily relates to his personal finances, with some asset information being for his corporation (Skeeba Studies, Inc.). He is managing a Stage IV cancer of his own, and I have tried to let his focus stay on that.

We have had discussions over the past six months on ways to mitigate further loss of assets and escalation of debt (especially for me). However, at this time, even the copying and mailing of this document and Petition for Writ of Certiorari will be paid for by credit card.

Please advise if additional information is needed. Thank you for your consideration.

STATE of KANSAS }
County of Douglas } ss.


Leslie J. Reynard, Affiant

Executed on March 29, 2024
At Lawrence, Douglas County, Kansas

Notary Public: 

