

24-6581
No.

In the Supreme Court of the United States

VELIN YASENOV MEZINEV,
PETITIONER

v.

BERMET TURUZBEKOVNA TASHYBEKOVA

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF THE STATE
OF NEW YORK APPELLATE DIVISION, FIRST
DEPARTMENT

MOTION FOR LEAVE TO PROCEED
IN FORMA PAUPERIS

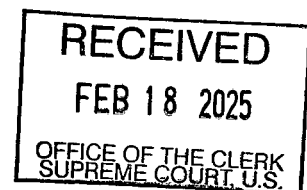
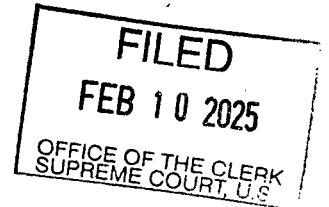
The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*. The petitioner has not previously been granted leave to proceed *in forma pauperis* in any other court. Petitioner's declaration and appendix in support of the motion and pursuant to 28 U. S. C. §1746 is attached hereto.

Respectfully Submitted,

February 9, 2025



VELIN Y. MEZINEV
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(359) 88-279-9917



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

I, Velin Y. Mezinev, 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>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Self-employment	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Interest and dividends	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Gifts	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Alimony	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Child Support	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Unemployment payments	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</u>
Total monthly income:	\$ <u>0</u>	\$ <u>N/A</u>	\$ <u>0</u>	\$ <u>N/A</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
None	N/A	N/A	\$ 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	N/A	N/A	\$ N/A
			\$
			\$

4. How much cash do you and your spouse have? \$ 1,572 in euros
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	\$ 1,572 in euros	\$ N/A
rollover IRA	\$ 4	\$ N/A
	\$	\$

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

<input checked="" type="checkbox"/> Home	<input checked="" type="checkbox"/> Other real estate *
Value by title \$13,817*	Value uncertain
* Realizable value uncertain due to lack of permit.	* Raw land restituted by the Bulgarian State.

<input type="checkbox"/> Motor Vehicle #1	<input type="checkbox"/> Motor Vehicle #2
Year, make & model None	Year, make & model None
Value	Value

☐ Other assets None

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
None	\$ 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	Age
Y.M. son for whom I serve as the sole parent of nurture		3
J.M.	daughter	11

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	\$ N/A
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ 111	\$ N/A
Home maintenance (repairs and upkeep)	\$ 35	\$ N/A
Food	\$ 165	\$ N/A
Clothing	\$ 15	\$ N/A
Laundry and dry-cleaning	\$ 10	\$ N/A
Medical and dental expenses	\$ 80	\$ N/A

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 30	\$ N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ 5	\$ N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ 0	\$ N/A
Life	\$ 0	\$ N/A
Health	\$ 22	\$ N/A
Motor Vehicle	\$ 0	\$ N/A
Other: _____	\$ 0	\$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): <u>real estate</u>	\$ 17	\$ N/A
Installment payments		
Motor Vehicle	\$ 0	\$ N/A
Credit card(s)	\$ 0	\$ N/A
Department store(s)	\$ 0	\$ N/A
Other: _____	\$ 0	\$ N/A
Alimony, maintenance, and support paid to others	\$ 0*	\$ N/A
	* \$550,000 cumulatively	
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ 0	\$ N/A
Other (specify): _____	\$ 0	\$ N/A
Total monthly expenses:	\$ 490*	\$ N/A

* Fee, alimony, maintenance, support and other benefits paid to Ms. Tashybekova approximate \$550,000 cumulatively.

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
historically prospectively

If yes, how much? \$647,689 refer to the appendix and Record 986

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

Refer to the attached appendix and Record 986.

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?

historically prospectively
☒ Yes ☒ No

If yes, how much? \$47,399 refer to the appendix and Record 986

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

Refer to the attached appendix and Record 986.

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

Ms. Tashybekova's false allegations tarnished my reputation, precipitated the termination of my 12-year tenure with my prior employer without cause, and compelled me to spend \$510,412 to assert my rights in a separate employment-discrimination litigation. Refer to the Appendix. Total fees paid--\$1,205,501. My subsequent position on the adjunct faculty of New York Institute of Technology did not allow me to maintain a household of my own. The employment litigation is ongoing, and is being handled by Kaiser Saurborn & Mair on a contingency basis.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 9 , 2025

Executed on:



(Signature)

In the Supreme Court of the United States

VELIN YASENOV MEZINEV
MOVANT

APPENDIX TO MOTION

10. (continued)

Attorneys—for petitioner and respondent

\$212,394 paid to Robert Wallack, 370 Lexington Ave., NY, NY 10017, (212) 651-6461
\$130,00 paid to Lawrence Braunstein, 333 Westchester Ave., White Plains, NY 10604,
(914) 997-6220
\$127,776 paid to Barry Abbott, 444 Madison Ave., NY, NY 10022, (646) 277-1325
\$70,000 paid to Corey Shapiro, 420 Lexington Ave, NY, NY 10170, (212) 390-0845
\$66,644 paid to Paul Talbert, 120 W 45th Str., NY, NY 10036, (212) 689-1600
\$16,200 paid to Alissa Van Horn, 15 Maiden Lane, NY, NY 10038 (516) 277-2772
\$7,500 paid to Adam Miller, 950 Third Ave., NY, NY 10022, (646) 825-1097
\$3,500 paid to Lawrence Beckenstein, 60 E 42nd Str., NY, NY 10165, (212) 920-4503
\$3,275 paid for various consultations

Attorney, Expert, and Author

\$10,400 paid to Jeremy D. Morley, 230 Park Ave., NY, NY 10139, (212) 372-3425
\$647,689 sub-total to divorce-related attorneys

11. (continued)

Forensic psychologist

\$29,200 paid to Paul Hymowitz, 60 W 13th Str., NY, NY 10011, (212) 645-8815

Supervised parenting

\$11,719 paid to Comprehensive Family Services, 450 Lex. Ave., NY, NY 10017, (212) 267-2670

Parenting coordinator

\$750 to Dr. Larry Cohen, 875 6th Ave., Suite 1603, NY, NY 10001, (516) 747-8583

Appellate printing and formatting

\$5,730 to Todd Lewis, 10 Bond Street, Great Neck, NY 11021, (516) 858-0222

\$47,399 sub-total to divorce-related non-attorneys

12. (continued)

Employment-discrimination litigation—attorney and non-attorneys

\$490,268 paid to Andrew Singer, 900 Third Ave., NY, NY 10022, (212) 508-6723
\$7,780 paid to Johanny Olmedo, 11 E 44th St., NY, NY 10017, (347) 267-3991
\$12,363 paid for scanning, transcript, technology, and expert support to numerous
\$510,412 for employment-discrimination litigation