

25-5166

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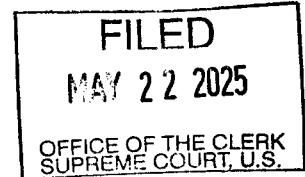
No. \_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES

THOMAS EDWARD CAMARDA,  
Petitioner,

v.

ELIZABETH WHITEHORN, et al.,  
Respondents.



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

Petitioner, **Thomas Edward Camarda**, respectfully moves for leave to file the attached Petition for a Writ of Certiorari **without prepayment of costs** and to proceed *in forma pauperis* pursuant to **Supreme Court Rule 39.1**.

Petitioner has been the **prevailing party by operation of law** in the lower court pursuant to **FRAP 31(c)** and **Rule 56(a)**, but has suffered unlawful financial seizures and retaliation by state actors **after the record was sealed and judgment perfected**. As documented in the Petition and Appendix, enforcement has included:

- Repeated **bank levies**
- **\$4,980 seized on May 16, 2025**
- Retaliatory garnishments, criminal prosecution, and administrative obstruction

As a direct result of these unconstitutional acts under color of law, Petitioner currently **lacks the funds to pay the \$300 Supreme Court filing fee**, nor to print and serve 40 booklet copies. Despite having prevailed on the record, Petitioner's access to resources remains constrained by ongoing Title IV-D misconduct.

**Petitioner is not incarcerated**, is **self-represented**, and files this motion in **good faith**, asserting that the facts in the attached affidavit are true and accurate to the best of his knowledge.

**AFFIDAVIT OR DECLARATION IN SUPPORT OF MOTION**

I, **Thomas Edward Camarda**, declare that:

1. I am the petitioner in the above-entitled case.
2. Because of my financial situation and ongoing retaliatory seizures by state actors, I am **unable to pay the costs of this case** or give security therefor.

3. I believe I am entitled to redress. My **constitutional rights**, including due process and federal supremacy, have been violated.
4. I am **not currently employed** in a salaried position and have **no access to unrestricted assets** due to unlawful levies and garnishments.
5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: **May 16, 2025**

**/s/ Thomas Edward Camarda**  
**Thomas Edward Camarda**  
500 Cunat Blvd #2B  
Richmond, IL 60071  
tcamarda@gmx.com  
(224) 279-8856

No. \_\_\_\_\_

\_\_\_\_\_  
IN THE  
SUPREME COURT OF THE UNITED STATES  
\_\_\_\_\_

Thomas E. Camarda — PETITIONER  
(Your Name)

VS.

Elizabeth M. Whitehorn et al. — 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.

Thomas Camarda  
(Signature)

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

I, Thomas E. Camardo, 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>35-45K</u>	\$ _____	\$ _____	\$ _____
Self-employment	\$ <u>0 but scalable post judgment</u>	\$ _____	\$ _____	\$ _____
Income from real property (such as rental income)	\$ _____	\$ _____	\$ _____	\$ _____
Interest and dividends	\$ _____	\$ _____	\$ _____	\$ _____
Gifts	\$ _____	\$ _____	\$ _____	\$ _____
Alimony	\$ _____	\$ _____	\$ _____	\$ _____
Child Support	\$ _____	\$ _____	\$ _____	\$ _____
Retirement (such as social security, pensions, annuities, insurance)	\$ _____	\$ _____	\$ _____	\$ _____
Disability (such as social security, insurance payments)	\$ _____	\$ _____	\$ _____	\$ _____
Unemployment payments	\$ _____	\$ _____	\$ _____	\$ _____
Public-assistance (such as welfare)	\$ _____	\$ _____	\$ _____	\$ _____
Other (specify): _____	\$ _____	\$ _____	\$ _____	\$ _____
<b>Total monthly income:</b>	\$ <u>&lt;\$1,500/mo</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
INH Surs Inc	3850 Wilke Rd Arlington Hts, IL 60004	01-2012 → 10-2024 01-2025 → 03-2025	\$ 8K /mo \$ → \$ < \$1.5K /mo damages from Appellees

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? \$ N/A  
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	\$ - 225	\$
	\$	\$
	\$	\$

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 2022 Dodge Charger  
Value \$30K @ risk of repo due to damages

☒ Motor Vehicle #2  
Year, make & model 2017 Chevy Malibu  
Value \$5K → repo July 2024  
indirect harms of April 2024  
unlawful levies & garnishments

☐ 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
<u>Illinois HFS</u>	<u>\$ 1.8 mil damages</u>	<u>\$ _____</u>
<u>Elizabeth Whitman</u>	<u>\$53K collateral</u>	<u>\$ _____</u>
<u>et al.</u>	<u>\$89K total</u>	<u>\$ _____</u>

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>R.C.</u>	<u>Son</u>	<u>11</u>
<u>K.C.</u>	<u>Son</u>	<u>8</u>
<u>_____</u>	<u>_____</u>	<u>_____</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>\$ 1650</u>	<u>\$ _____</u>
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)	<u>\$ 491</u>	<u>\$ _____</u>
Home maintenance (repairs and upkeep)	<u>\$ _____</u>	<u>\$ _____</u>
Food	<u>\$ 900</u>	<u>\$ _____</u>
Clothing	<u>\$ 65</u>	<u>\$ _____</u>
Laundry and dry-cleaning	<u>\$ 50</u>	<u>\$ _____</u>
Medical and dental expenses	<u>\$ _____</u>	<u>\$ _____</u>

	You	Your spouse
Transportation (not including motor vehicle payments)	<u>Varies (business)</u> <u>\$ ~ 2,500 +</u>	\$ _____
Recreation, entertainment, newspapers, magazines, etc.	<u>\$ 150</u>	\$ _____
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	<u>\$ 20</u>	\$ _____
Life	\$ _____	\$ _____
Health	\$ _____	\$ _____
Motor Vehicle	<u>\$ 248</u>	\$ _____
Other: _____	\$ _____	\$ _____

Taxes (not deducted from wages or included in mortgage payments)

(specify): \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

Installment payments

Motor Vehicle	<u>\$ 1092 (4+ behind e risk)</u> <u>700 + 400 balance</u>	\$ _____
Credit card(s)	<u>\$ delinquent due</u> <u>damages</u>	\$ _____
Department store(s)	\$ _____	\$ _____
Other: _____	\$ _____	\$ _____

*Notice: Title IV-D authority dissolved*  
 Alimony, maintenance, and support paid to others \$ 2148/mo +22,000 collected/seized  
n/No contract! \$ pending it!

Regular expenses for operation of business, profession, or farm (attach detailed statement) \$ See travel \$ \_\_\_\_\_

Other (specify): \_\_\_\_\_ \$ \_\_\_\_\_ \$ \_\_\_\_\_

Total monthly expenses: \$ 7140 →  
9288 \$ \_\_\_\_\_

*including dissolved Title IV-D extraction, See Appendixes/Record*

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.

At this time, I am unable to pay the cost of this case due to significant financial damage caused directly by the appellees and exacerbated by unlawful enforcement actions taken during the pendency of this litigation. These actions include multiple unauthorized seizures of funds totaling over \$15,000, interference with my ability to earn a living, and the chilling effect of reputational and procedural harm. The burden of delayed judgment has not only deprived me of timely legal remedy but has also perpetuated a cycle of retaliation and financial instability. While I remain willing to pay the filing fee if funds become available at a future time, I respectfully ask the Court to recognize that my current financial condition — including irregular, unpredictable income and ongoing hardship — makes that impossible at present. The severe economic impact of judgment suppression and unlawful collection actions has left me unable to cover even basic living costs at times, and any further delay in this matter compounds the harm already suffered. This petition is critical not only to vindicate my constitutional rights, but also to restore access to financial and professional normalcy.

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

Executed on: May 18, 2025

  
(Signature)



**Attachment to Question 9: Expected Changes in Income, Expenses, Assets, or Liabilities (Next 12 Months)**

**Petitioner:** Thomas Edward Camarda

**Docket No.:** \_\_\_\_\_

**Case:** *Camarda v. Whitehorn, et al.*

I anticipate several material changes in my financial circumstances over the next twelve months, stemming directly from ongoing litigation, retaliatory enforcement actions, and systemic interference with my livelihood. These changes are outlined as follows:

**1. Expected Increase in Income (Conditional and Uncertain)**

I am actively attempting to rebuild my professional income after a documented collapse in 2024–2025 due to unlawful seizures of funds, reputational harm, and retaliatory actions from state agencies. I formerly earned approximately \$187,000/year as a business consultant but have not recovered that level of income since the improper seizure of \$7,900 in April 2024 and subsequent financial retaliation.

While I am attempting to restore my income, it is highly uncertain due to:

- Continued post-judgment garnishments and levies despite a sealed federal record;
- Ongoing harm to professional relationships and opportunities;
- Risk of additional state retaliation pending resolution of the present case.

**2. Potential Changes in Monthly Expenses**

My monthly expenses may **increase significantly** due to:

- Continued self-funding of legal filings and document printing (often exceeding \$300–\$500 per month);

- Postage, travel, and service of process expenses required to litigate this matter in federal court and at the U.S. Supreme Court level;
- The ongoing need to secure housing, utilities, and basic living costs while under financial duress.

### **3. Anticipated Asset and Liability Adjustments**

I do not possess substantial assets. I anticipate potential increases in **debt/liabilities** if forced to borrow or exhaust credit to continue litigation or cover basic survival costs. Additionally, should restitution or damages be awarded, my financial position may stabilize — but until that point, I remain at risk of insolvency due to persistent unlawful takings and procedural obstruction by state actors.

### **4. Legal-Driven Uncertainty**

My financial trajectory over the next year depends heavily on the outcome of the present case. The Supreme Court's recognition of the perfected judgment and formal enforcement could relieve financial strain. However, continued obstruction by lower courts or state actors will likely exacerbate financial instability.

I respectfully request that the Court take into account the volatile and retaliatory environment in which I am currently forced to operate, and recognize the legitimacy of the IFP application in light of these uncontrollable and severe changes.

**Respectfully submitted,**

/s/ Thomas Edward Camarda  
May 21, 2025

## **CERTIFICATE OF COMPLIANCE**

As required by Rule 33.1(h) of the Rules of the Supreme Court of the United States, I certify that the petition for a writ of certiorari contains **7,322 words**, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d). This document has been prepared in a proportionally spaced typeface using **Microsoft Word or Microsoft Outlook in Century Schoolbook, 12-point font.**

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

Respectfully submitted,

Thomas Edward Camarda

Pro Se Petitioner

**Prevailing Party under FRAP 31(c), Rule 56(a), and Article VI, U.S.  
Constitution**

**Secured Party Creditor — UCC-1 Perfected**

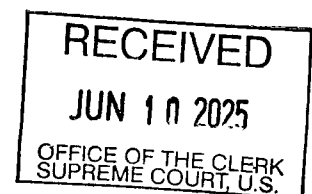
500 Cunat Blvd #2B

Richmond, IL 60071

tcamarda@gmx.com

(224) 279-8856

Dated: **June 6, 2025**



## **CERTIFICATE OF SERVICE**

I, Thomas Edward Camarda, do hereby certify that, as required by Supreme Court Rule 29, I have served a copy of the **Petition for a Writ of Certiorari** and accompanying documents on all parties to the above proceeding or their counsel, and on every other person required to be served.

Service was made by U.S. Mail, postage prepaid, addressed as follows:

**Elizabeth Whitehorn et al.**

401 S Clinton St  
Chicago IL, 60607 and/or

201 S Grand Ave  
Springfield, IL 62763

**Counsel for Respondents:**

Office of the Illinois Attorney General  
100 W Randolph St  
Springfield, IL 62701

United States Court of Appeals for the Seventh Circuit Clerk's Office  
United States District Court for Northern District of Illinois, Western Division  
Clerk's Office

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

Respectfully submitted,

Thomas Edward Camarda  
Pro Se Petitioner

**Prevailing Party under FRAP 31(c), Rule 56(a), and Article VI, U.S.  
Constitution**

**Secured Party Creditor — UCC-1 Perfected**

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Dated: **June 6, 2025**