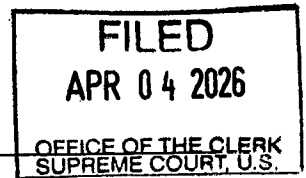


25-7208

Case No. _____

ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES



ALBERT W. COBURN,
Petitioner,

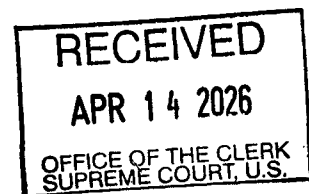
v.

THE STATE OF WASHINGTON DEPARTMENT OF SOCIAL AND HEALTH SERVICES,
CHILD PROTECTIVE SERVICES, a state government and its division and agency,
Respondent

ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF
WASHINGTON

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioner ALBERT COBURN (Pro Se)
7001 Seaview Ave. NW
Suite 160-836
Seattle WA 98117
206-696-2636



MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioner, Albert Whitney Coburn, respectfully moves for leave to file the accompanying *Petition for a Writ of Certiorari* without prepayment of costs and to proceed in forma pauperis pursuant to Supreme Court Rule 39.

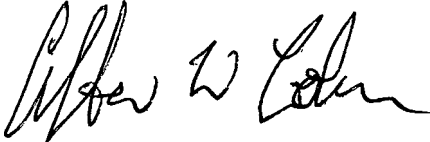
Petitioner has not previously been granted leave to proceed in forma pauperis in this case.

Petitioner is indigent and unable to pay the docketing fee or printing costs required for filing.

Petitioner proceeds pro se. An affidavit or declaration in support of this motion is attached, along with supporting financial documentation.

WHEREFORE, Petitioner respectfully requests that this Court grant leave to proceed in forma pauperis.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Albert W. Coburn", written in a cursive style.

Date: 4/4/2026

Albert Whitney Coburn
Petitioner, Pro Se
7001 Seaview Ave NW, Suite 160-836
Seattle, WA 98117
(206) 696-2636

Case No. _____

IN THE SUPREME COURT OF THE UNITED STATES

ALBERT W. COBURN,
Petitioner,

v.

THE STATE OF WASHINGTON DEPARTMENT OF SOCIAL AND HEALTH SERVICES,
CHILD PROTECTIVE SERVICES, a state government and its division and agency,
Respondent

**ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF
WASHINGTON**

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

Petitioner ALBERT COBURN (Pro Se)
7001 Seaview Ave. NW
Suite 160-836
Seattle WA 98117
206-696-2636

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

I, Albert Coburn 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.

Albert Coburn (Petitioner) is not married and is single.
Income of Spouse: N/A

Source of Gross Income (Past 12 Months)	Average monthly amount during the past 12 months	Amount expected next month	Notes
Employment *	N/A*; see below	N/A	W-2 wages from Allyis Inc (01/2025–07/2025); employment ended July 2025
Self-employment	0	0	
Income from real property (rent, etc.)	0	0	
Interest and dividends	\$2	\$2	\$20.49 BECU; \$0 KeyBank
Gifts	0	0	
Alimony	0	0	
Child support received	0	0	
Retirement (Social Security, pensions, annuities)	0	0	
Disability (Social Security, insurance payments)	0	0	
Unemployment payments **	see total row below	0	Unemployment (08/16/2025- 02/16/2026)

Public assistance (welfare, etc.)	0	0	
Other	0	\$5,000	Proceeds from sale of prior liveaboard boat (\$5,000 on 03/23/2026) were immediately used for basic living expenses and child-support obligations and are no longer available.
Total Gross Monthly Income* 04/2025–07/2025	\$7,664*	0	While employed at Allyis (01/2025–07/2025)
Total Gross Monthly Income** (08/16/2025- 02/16/2026)	\$3,969**	0	Unemployment (08/16/2025- 02/16/2026)
Total Monthly Income	\$4,541***	\$2	Employment ended in July 2025, and I have had no income since then except unemployment, which ended February 16, 2026.

- * Income was earned only during the period of January–July 2025. Because this income did not occur over a full 12-month span, a true “average monthly amount during the past 12 months” cannot be calculated. The figure shown above represents the average monthly income during the months actually worked, which is the only mathematically accurate representation.
- ** Unemployment benefits were received only during the period of August 16, 2025–February 16, 2026. As with employment income, these benefits did not span the full 12-month period. The figure shown above reflects the average monthly amount during the months that benefits were actually received.
- *** Note: This figure represents total income received between April 2, 2025 and April 2, 2026 divided by 12, as required by the form. Because income occurred in two distinct periods (employment through July 2025 and unemployment through February 2026), this average does not reflect any actual month’s income. Detailed period-specific averages are provided above for accuracy and transparency. Employment ended in July 2025, and I have had no income since then except unemployment, which ended February 16, 2026.

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Your employment history:

Employer: Unemployed
 Dates: 08/2025 – 02/16/2026
 Gross monthly pay: \$3,969

Employer:

ALLYIS INC
17425 NE UNION HILL RD #100
REDMOND WA 98052
Dates of employment: 11/2023-07/2025
Gross monthly pay: \$7,664

**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.)**

N/A - Albert Coburn (Petitioner) is not married and is single.

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.

Albert Coburn (Petitioner) is not married and is single.
Income of Spouse: N/A

Bank accounts (checking, savings, etc.)	\$ Amount you have	Notes
BECU Checking	\$2,671	BECU
BECU Savings	\$10	BECU
KeyBank Checking	\$5	KeyBank
Total	\$2,689	

- NOTE: My bank account balances are typically near zero. Any funds that appear in my accounts are immediately consumed by basic living expenses, ongoing child-support withholding, and court-ordered obligations. In addition, I am responsible for substantial child-related expenses for my disabled child — including medical costs, therapy, and autism-related services — that are not garnished and must be paid directly at a 70.2% proportional share. These obligations routinely exceed my available funds. The amounts listed above reflect momentary balances at the time of filing, not stable or reliable resources.

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

Albert Coburn (Petitioner) is not married and is single.
Assets of Spouse: N/A

Asset (Home, real estate, motor vehicle, etc.)	\$ value	Description	Notes

Motor Vehicle #1	\$5,000	1999 Jeep Wrangler	Value based on price being asked in sale ad. For sale since 04/2019.
Motor Vehicle #2 (serves as lodging when in Seattle)	~\$4,000	1991 Toyota HiAce campervan	Value low due to high mileage and previously wrecked.
Liveaboard Boat – Prior, currently up for sale due to damage	*Sold March 23, 2026	1982 San Juan 34	
Liveaboard Boat – Current (in Kitsap County)	~\$8,000	1982 S2 11A	Boat was donated to me 09/2025 by Life Staff Ministries. Value reduced due to recent failed motor.
Other assets	None	None	
Total	\$17,000		Non-Retirement Assets

- ***Liveaboard Boat before donated S2 11A sailboat – Sold March 23, 2026 for \$5,000.**
The proceeds were immediately used to pay basic living expenses, transportation costs required to maintain parenting time, and child-support-related obligations. The funds are no longer available and did not increase my financial capacity to pay Supreme Court filing fees.
- NOTE: I have no home or real-estate of any kind. These assets are non-liquid; some have been listed for sale for extended periods and cannot be readily converted to cash to pay the filing fee. Additionally, one vessel serves as my primary housing and cannot be sold without rendering me homeless.

Asset	Value	Description	Notes
401(k)	\$ 162,637	Employer-sponsored retirement account	Early withdrawal penalties; not liquid; cannot be used for living expenses
IRA (Traditional) BECU	\$18,622	Retirement account	Not liquid; subject to penalties
Total	\$181,259		Retirement Accounts

- NOTE: These retirement accounts are not liquid assets and cannot be accessed without substantial penalties; they are my only retirement savings and cannot be used to pay filing or printing costs.

6. State every person, business, amount owed. or organization owing you or your spouse money, and the amount owed

Albert Coburn (Petitioner) is not married and is single.
Amount owed to Spouse: N/A

Person owing you or your spouse money	\$ Amount owed to you
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
EC	Daughter	14

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.

Albert Coburn (Petitioner) is not married and is single.
Monthly Expenses of Spouse: N/A

A. Basic Monthly Expenses

Expenses	You	Description
Rent (moorage) Are real estate taxes included? N/A Is property insurance included? N/a	\$216	Seasonal moorage \$408/month (10/2025–02/2026), averaged to \$216/month over 12 months.
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$30	Cell phone
Home maintenance (repairs and upkeep)	\$180	Boat maintenance to keep it afloat and habitable for me and to host my daughter
Food	\$327	Groceries and basic necessities including providing for daughter
Clothing	\$45	Personal items as well as clothing and footwear for daughter
Laundry and dry-cleaning	\$8	
Medical and dental expenses out-of-pocket	\$38	Personal non-child related – co-pays and prescriptions
Transportation (not including motor vehicle payments) (to see daughter 3 weekends/month)	\$238	Ferry & Parking expenses for pickups and drops offs to and from Seattle where child resides, due to having to move to Kitsap County (cheaper area)

plus select Wednesdays)		
Transportation (not including motor vehicle payments) (personal)	\$249	Fuel and local travel
Recreation, entertainment, newspapers, magazines, etc.	\$120	Costs associated with 3 weekends/month with daughter for camping trips and activities
Homeowner's or renter's Insurance	N/A	
Life	\$35	
Medical and dental Insurance	0	Currently Uninsured
Motor Vehicle Insurance	\$20	Liability coverage
Other Insurance:	\$22	Boat Insurance
Taxes	0	
Motor Vehicle Installment payments	0	
Credit Card Installment payments	\$4	
Department Store Installment payments	0	
Other Installment payments	0	
Alimony, maintenance, and support paid to others	See Monthly Child Support below	
Regular expenses for operation of business or farm (attach detailed statement)	0	
Other: Attorney Fees	\$3,238	See Section 10, Attorney Fees paid
Total	\$4,770	Basic Monthly Expenses excluding monthly child support expenses:

B. Monthly Child Support (not including other child support debt, as outlined in Section 12)

Expenses	\$ Cost	Description
Monthly Basic Child Support	\$1022	DCS garnishment
Occupational Therapy	\$70	Autism-related OT (annual cost \$844.29)
Speech Therapy	\$110	Autism-related speech therapy (annual cost \$1,322.42)
Parenting Communication tool	\$14	Court ordered email communications to OurFamilyWizard (annual cost 165.51)
Total	\$1,216	Monthly Basic Child Support

- Total Yearly Basic Child Support: \$14,592
- NOTE REGARDING CHILD-SUPPORT-RELATED DEBT: The monthly child support amounts listed above represent only the recurring, predictable monthly obligations. They do not include the court-ordered child-support expenses totaling \$46,084, which are due immediately and cannot be averaged into a monthly figure. These expenses are not periodic, not discretionary, and not payable over 12 months; they are lump-sum obligations that must be paid at once, and failure to do so may result in additional contempt rulings. Because the form requires “average monthly expenses,” and because this debt is not a monthly expense and cannot be mathematically converted into one, it is instead fully detailed in Section 9 (Debts and Financial Obligations).
- Grand Total monthly expenses: \$5,986

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

A. Personal Debts

Expense	\$ Outstanding Balance	Due Date	Notes
Medical (Out of pocket)	\$1,354	01/06/2026	UPMC
Total	\$1,354		Personal expenses due

B. Child Support Expenses Debts

a. Court-Ordered Contempt Judgments

Court ordered judgments for this case:

Expense	\$ Amount Paid	\$ Outstanding Balance	Due Date (past due)	Notes (debts still owed)
2024 Child Support Contempt Order	\$4,892	\$11,956	03/04/2024	\$16,848 Private school tuition
	\$100	0	03/04/2024	\$100 fine
	\$4,022	0	03/04/2024	\$4,022.48 legal fees to opposing party
Court of Appeals Order (2025)	0	\$13,787	10/04/2025	\$13,787 legal fees to opposing party
03/10/2025 Child Support Contempt Order - Court	0	\$4,212	03/10/2025	Private school tuition purge
	0	\$2,878	03/10/2025	Private school tuition
	0	\$5,695	03/10/2025	ABA Therapy

ordered judgment for 2 nd contempt failing to meet purge conditions of this case.	0	\$3,517	03/10/2025	Summer Camps
	0	\$250	03/10/2025	fine
Total	\$9,014	\$42,292		

b. Unpaid Child-Related Expenses

(Recently indicated by co-parent on Our Family Wizard; certain expenses are under legal dispute)

Expense	\$ Amount Paid	\$ Outstanding Balance	Due Date	Notes
Speech Therapy (Nov-Dec 2025)	\$0	\$187.15	01/01/2026	Autism-related speech therapy
Virginia Mason	\$0	\$52.61	01/01/2026	Medical expense
Children's Bill	\$0	\$28.62	01/01/2026	Medical expense
Parkour Summer Camp	\$0	\$277.29	01/01/2026	Summer camp
Jan 2025 Dr. Appointment	\$0	\$17.02	01/01/2026	Medical expense
Speech Therapy (May 29, 2025)	\$0	\$109.93	01/01/2026	Autism-related speech therapy
Boys & Girls Summer Camp	\$0	\$315.90	01/01/2026	Summer camp
PT/OT Statement	\$0	\$142.11	01/01/2026	Autism-related OT/PT
Speech Therapy (March 2025)	\$0	\$221.42	01/01/2026	Autism-related speech therapy
Speech Therapy (Feb 2025)	\$0	\$237.12	01/01/2026	Autism-related speech therapy
Dentist	\$0	\$30.64	01/01/2026	Dental expense
Speech Therapy (Oct 2024)	\$0	\$73.88	01/01/2026	Autism-related speech therapy
OT Bill	\$0	\$599.51	01/01/2026	Autism-related OT
Speech Bill	\$0	\$61.52	01/01/2026	Autism-related speech therapy
Neo Art School Summer Camp	\$0	\$333.45	01/01/2026	Summer camp
UW Summer Camp	\$0	\$252.72	01/01/2026	Summer camp
Spring Camp 2024	\$0	\$403.65	01/01/2026	Spring camp
Virginia Mason (Feb 2023)	\$0	\$35.10	01/01/2026	Medical expense

All Smiles Dentistry	\$0	\$41.77	01/01/2026	Dental expense
Dr. McCabe (May 2021)	\$0	\$166.03	01/01/2026	Medical expense
Kaili Houston Childcare	\$0	\$201.24	01/01/2026	Childcare
Total	\$0	\$3,789		

- **Grand Total child-support-related debt currently due: (\$42,295 + \$3,789)=\$46,084**

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? - No

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?

No

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

Using only the gross income figures reported in this affidavit, my financial circumstances show that I cannot pay the filing or printing costs required for this case. I currently have \$46,084 in immediately due child support related expenses, and I do not have income available to pay these obligations.

Over the past 12 months, my total gross income was \$54,498. During that same period, I was required to pay:

- \$14,592 in basic monthly child support, which I paid; and
- \$46,084 in outstanding child support related expenses, consisting of court ordered lump sum judgments and cannot be paid over time.

This represents \$60,640 in child support related obligations during the past 12 months — 110% of my gross income — including \$14,592 that I actually paid and \$46,084 that remains unpaid solely because it is impossible for me to pay lump sum judgments of this size. These judgments are immediately enforceable, and failure to pay them can result in additional contempt sanctions.

These calculations use gross income only. They do not account for taxes, mandatory deductions, or basic living expenses such as housing, food, transportation, medical care, or the costs of caring for and visiting my daughter. Because these percentages are based solely on gross income, they significantly understate the actual financial burden.

Even on a gross income basis, the court ordered obligations exceed my ability to pay. When combined with my monthly expenses, no funds remain for Supreme Court filing fees or printing costs. My employment ended in July 2025 due to widespread layoffs, and my unemployment benefits ended on February 16, 2026, after which my income was essentially \$0. I have been actively seeking employment since my layoff but have not yet secured new work.

I also have no liquid assets that could be used to pay filing fees. My retirement accounts total \$184,262, but they are not accessible without substantial penalties and are my only retirement savings. My vehicles and boat are non liquid assets; some have been listed for sale for extended periods, and one vessel serves as my primary housing and cannot be sold without rendering me homeless.

The child support related debts listed in this affidavit are mandatory obligations that must be paid before any other expenses, including filing fees for this case. Because these obligations consume the majority of my gross income and exceed my current financial capacity, I am unable to pay the costs of this case or give security therefor.

The financial hardship I face is directly connected to the constitutional injury raised in the petition. Had CPS fulfilled its statutory duty to investigate the 2016/2022 child abuse allegations, I would not have lost parenting time and decision making authority over medical, educational, and child support related expenses. The family court restrictions that followed the uninvestigated allegation transferred all decision making authority to the accuser, who has repeatedly incurred extraordinary medical, educational, and extracurricular expenses without regard to my income or ability to pay and without any mechanism for me to object. These expenses formed the basis of the contempt orders and child support judgments that now total \$46,084 and consume all available resources.

Because CPS never investigated the allegation, I was deprived of the only statutory mechanism capable of clearing my name, restoring my credibility, and preventing the loss of decision making authority that led directly to these financial obligations. The State's failure to investigate therefore caused both the constitutional injury and the financial hardship that prevents me from paying the filing fee.

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

Executed on 04/04/2026



Albert Whitney Coburn
Petitioner, Pro Se
7001 Seaview Ave NW, Suite 160-836
Seattle, WA 98117
206-696-2636