

CASE NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

JUAN ANTONIO LAMAR KINLEY, Petitioner,

vs.

**MARGARET BRADSHAW, WARDEN,
Respondent.**

**On Petition for a Writ of Certiorari to
the United States Court of Appeals for the Sixth Circuit**

**PETITIONER'S MOTION FOR LEAVE
TO PROCEED *IN FORMA PAUPERIS***

(CAPITAL CASE)

Andrew P. Avellano (OH 0062907)
MEMBER OF THE BAR OF THIS COURT
ATTORNEY AT LAW
4200 Regent Street, Suite 200
Columbus, Ohio 43219
Phone: (614) 237-8050
Email: andy@drewavo.com

Kathryn L. Sandford (OH 0063985)
MEMBER OF THE BAR OF THIS COURT
OFFICE OF THE OHIO PUBLIC DEFENDER
Assistant State Public Defender
250 East Broad Street, Suite 1400
Columbus, OH 43215
(614) 466-5394 (phone)
Email: kathryn.sandford@opd.ohio.gov

***COUNSEL OF RECORD**

Counsel for Petitioner Juan A.L. Kinley

PETITIONER'S MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

Petitioner Juan Kinley, through counsel, respectfully requests leave to file his Petition for Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit without the prepayment of costs or fees and to proceed *in forma pauperis* pursuant to Rule 39.1 of the Supreme Court Rules.

This is a death penalty case in which the Petitioner was sentenced to death in Ohio, after a trial conducted in March 1991, and that death sentence was affirmed on his direct appeal to the Supreme Court of Ohio. He proceeded *in forma pauperis* in the trial court for the proceedings there, also for purposes of his direct appeal in the Supreme Court of Ohio, and throughout all post-conviction proceedings, including Federal Habeas Corpus, which is the subject of this appeal. Petitioner is indigent, pursuant to his attached, signed affidavit of indigency.

Petitioner respectfully requests that his motion for leave to proceed *in forma pauperis* be granted.

Respectfully Submitted,

/s/ Andrew Avellano

Andrew P. Avellano (OH 0062907)
MEMBER OF THE BAR OF THIS COURT
ATTORNEY AT LAW
4200 Regent Street, Suite 200
Columbus, Ohio 43219
Phone: (614) 237-8050
Email: andy@drewavo.com

/s/ Kathryn Sandford

Kathryn L. Sandford (OH 0063985)
MEMBER OF THE BAR OF THIS COURT
OFFICE OF THE OHIO PUBLIC DEFENDER
Assistant State Public Defender
250 East Broad Street, Suite 1400
Columbus, OH 43215
(614) 466-5394 (phone)
Email: kathryn.sandford@opd.ohio.gov

*COUNSEL OF RECORD
Counsel for Petitioner Juan A.L. Kinley

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

I, Juan Kinley, 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>17.00</u>	\$ <u>0</u>	\$ <u>17.00</u>	\$ <u>0</u>
Self-employment	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Income from real property (such as rental income)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Interest and dividends	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Gifts	\$ <u>40.00</u>	\$ <u>0</u>	\$ <u>40.00</u>	\$ <u>0</u>
Alimony	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Child Support	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Disability (such as social security, insurance payments)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Unemployment payments	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Public-assistance (such as welfare)	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>

Income source	Average monthly amount during the past 12 months		Amount expected next month	
Other (specify): _____	\$ <u>6</u>	\$ <u>0</u>	\$ <u>0</u>	\$ <u>0</u>
Total monthly income:	\$ <u>157.00</u>	\$ <u>0</u>	\$ <u>157.00</u>	\$ <u>0</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
<u>RCI</u>	_____	_____	\$ <u>17.00</u>
<u>RCI</u>	_____	_____	\$ <u>17.00</u>
_____	_____	_____	\$ <u>0</u>

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
_____	_____	_____	\$ <u>0</u>
_____	_____	_____	\$ <u>0</u>
_____	_____	_____	\$ <u>0</u>

4. How much cash do you and your spouse have? \$ 0

Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Financial institution	Type of account	Amount you have	Amount your spouse has
_____	_____	\$ _____	\$ <u>0</u>
_____	_____	\$ _____	\$ <u>0</u>
_____	_____	\$ _____	\$ <u>0</u>

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

☐ Home Value <u>0</u>	☐ Other real estate Value <u>0</u>
☐ Motor Vehicle #1 Year, make & model _____ Value <u>0</u>	☐ Motor Vehicle #2 Year, make & model _____ Value <u>0</u>
☐ Other assets Description _____ Value <u>0</u>	

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>None</u>	\$ <u>0</u>	\$ <u>0</u>
<u>None</u>	\$ <u>0</u>	\$ <u>0</u>
<u>None</u>	\$ <u>0</u>	\$ <u>0</u>

7. State the persons who rely on you or your spouse for support.

Name	Relationship	Age
<u>None</u>	_____	\$ _____
<u>None</u>	_____	\$ _____
<u>None</u>	_____	\$ _____

8. Estimate the average monthly expenses of you and your family. Show separately the amount 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>0</u>
Are real estate taxes included? ☐ Yes ☒ No		
Is property insurance included? ☐ Yes ☒ No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ <u>0</u>	\$ <u>0</u>
Home maintenance (repairs and upkeep)	\$ <u>0</u>	\$ <u>0</u>
Food	\$ <u>0</u>	\$ <u>0</u>
Clothing	\$ <u>0</u>	\$ <u>0</u>
Laundry and dry-cleaning	\$ <u>0</u>	\$ <u>0</u>
Medical and dental expenses	\$ <u>0</u>	\$ <u>0</u>
Transportation (not including motor vehicle payments)	\$ <u>0</u>	\$ <u>0</u>
Recreation, entertainment, newspapers, magazines, etc.	\$ <u>0</u>	\$ <u>0</u>
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ <u>0</u>	\$ <u>0</u>
Life	\$ <u>0</u>	\$ <u>0</u>
Health	\$ <u>0</u>	\$ <u>0</u>
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ <u>0</u>	\$ <u>0</u>
Installment payments		
Motor Vehicle	\$ <u>0</u>	\$ <u>0</u>

	You	Your spouse
Credit card(s)	\$ <u>0</u>	\$ <u>0</u>
Department store(s)	\$ <u>0</u>	\$ <u>0</u>
Other: _____	\$ <u>0</u>	\$ <u>0</u>
Alimony, maintenance, and support paid to others	\$ <u>0</u>	\$ <u>0</u>
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ <u>0</u>	\$ <u>0</u>
Other (specify): _____	\$ <u>0</u>	\$ <u>0</u>
 Total monthly expenses:	 \$ <u>0</u>	 \$ <u>0</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? _____

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? _____

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

Broke !!!

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

Executed on: 8-11, 2026.

Juan. Kinley
(Signature)

08/12/2026

Ross Correctional Institution

Inmate Demand Statement

Inmate Name: KINLEY, JUAN A

Number: A239789

Lock Location: RCI,H4,A,,,128B

Date Range: 02/12/2026 Through 08/13/2026

Beginning Account Balances:

Ending Account Balances:

	Saving	Debt	Payable		Saving	Debt	Payable
Pos Exemption	\$0.00	\$0.00	\$0.00	Pos Exemption	\$15.00	\$0.00	\$0.00
Inmate's Perso	\$46.95	\$0.00	\$0.00	Inmate's Personal	\$18.73	\$0.00	\$0.00
Begin Totals	\$46.95	\$0.00	\$0.00	End Totals	\$33.73	\$0.00	\$0.00

Transaction Date / Inst.	Transaction Amount	Description	Comment	Saving Balance	Debt Balance	Payable Balance
02/28/2026	\$60.00	OffConnect Kiosk Deposit	22659524541734/Kinley, Stefan	\$106.95	\$0.00	\$0.00
RCI						
03/01/2026	(\$15.00)	Inmate's Personal Account	POS Exemption Transfer	\$91.95	\$0.00	\$0.00
RCI						
03/01/2026	\$15.00	Pos Exemption	POS Exemption Transfer	\$106.95	\$0.00	\$0.00
RCI						
03/06/2026	\$17.00	State Pay	State Pay	\$123.95	\$0.00	\$0.00
RCI						
03/12/2026	(\$20.55)	Commissary Sale	Ticket Number 725927	\$103.40	\$0.00	\$0.00
RCI						
03/21/2026	\$70.00	OffConnect Kiosk Deposit	22660023375141/Kinley, Stefan	\$173.40	\$0.00	\$0.00
RCI						
03/25/2026	\$25.00	OffConnect Kiosk Deposit	22660091035427/Sandford , Kathryn	\$198.40	\$0.00	\$0.00
RCI						
03/26/2026	\$25.00	OffConnect Kiosk Deposit	22711933892004/Avellano, Andrew	\$223.40	\$0.00	\$0.00
RCI						
03/26/2026	(\$92.31)	Commissary Sale	Ticket Number 727476	\$131.09	\$0.00	\$0.00
RCI						
03/26/2026	(\$74.33)	Commissary Sale	Ticket Number 727477	\$56.76	\$0.00	\$0.00
RCI						
04/01/2026	(\$15.00)	Inmate's Personal Account	POS Exemption Transfer	\$41.76	\$0.00	\$0.00
RCI						
04/01/2026	\$15.00	Pos Exemption	POS Exemption Transfer	\$56.76	\$0.00	\$0.00
RCI						

04/01/2026	(\$4.88) Commissary Sale	Ticket Number 727575	\$51.88	\$0.00	\$0.00
RCI					
04/03/2026	\$17.00 State Pay	State Pay	\$68.88	\$0.00	\$0.00
RCI					
04/07/2026	\$60.00 OffConnect Kiosk Deposit	22722033741862/Kinley, Stefan	\$128.88	\$0.00	\$0.00
RCI					
04/16/2026	(\$107.57) Commissary Sale	Ticket Number 729170	\$21.31	\$0.00	\$0.00
RCI					
04/16/2026	(\$0.74) Commissary Sale	Ticket Number 729336	\$20.57	\$0.00	\$0.00
RCI					
04/28/2026	\$50.00 OffConnect Kiosk Deposit	22749501760422/Kinley, Stefan	\$70.57	\$0.00	\$0.00
RCI					
04/28/2026	(\$63.37) Commissary Sale	Ticket Number 730764	\$7.20	\$0.00	\$0.00
RCI					
05/01/2026	\$0.00 \$15.00 Reservation to Pos Exemption	Odroc Pos Exemption	\$7.20	\$0.00	\$0.00
RCI					
05/08/2026	\$17.00 State Pay	State Pay	\$24.20	\$0.00	\$0.00
RCI					
05/12/2026	(\$21.86) Commissary Sale	Ticket Number 732298	\$2.34	\$0.00	\$0.00
RCI					
05/12/2026	(\$1.91) Commissary Sale	Ticket Number 732299	\$0.43	\$0.00	\$0.00
RCI					
05/17/2026	\$30.00 OffConnect Kiosk Deposit	22761260809638/Kinley, Stefan	\$30.43	\$0.00	\$0.00
RCI					
05/28/2026	\$23.77 Commissary Sale	Ticket Number 734206	\$54.20	\$0.00	\$0.00
RCI					
06/01/2026	(\$8.77) Pos Exemption	POS Exemption Transfer	\$45.43	\$0.00	\$0.00
RCI					
06/01/2026	\$8.77 Inmate's Personal Account	POS Exemption Transfer	\$54.20	\$0.00	\$0.00
RCI					
06/05/2026	\$17.00 State Pay	State Pay	\$71.20	\$0.00	\$0.00
RCI					
06/11/2026	(\$10.20) Commissary Sale	Ticket Number 735807	\$61.00	\$0.00	\$0.00
RCI					
06/16/2026	\$50.00 OffConnect Kiosk Deposit	22789676235174/Kinley, Stefan	\$111.00	\$0.00	\$0.00
RCI					

06/25/2026	\$30.00 OffConnect Kiosk Deposit	22789856890406/Kinley, Stefan	\$141.00	\$0.00	\$0.00
RCI					
06/26/2026	(\$138.84) Commissary Sale	Ticket Number 737589	\$2.16	\$0.00	\$0.00
RCI					
07/01/2026	\$0.00 \$15.00 Reservation to Pos Exemption	OdrC Pos Exemption	\$2.16	\$0.00	\$0.00
RCI					
07/02/2026	\$17.00 State Pay	State Pay	\$19.16	\$0.00	\$0.00
RCI					
07/07/2026	(\$0.96) Postage Charges (USPS)	POSTAGE KEEGAN	\$18.20	\$0.00	\$0.00
RCI					
08/06/2026	(\$0.50) Copy Charges	COPIES	\$17.70	\$0.00	\$0.00
RCI					
08/07/2026	\$17.00 State Pay	State Pay	\$34.70	\$0.00	\$0.00
RCI					
08/11/2026	(\$0.97) Postage Charges (USPS)	Constance Wright	\$33.73	\$0.00	\$0.00
RCI					

Outstanding Debts:

Start Date	Description	Case	Agency	County	Total Debt	Paid to Date	Balance Owed
------------	-------------	------	--------	--------	------------	--------------	--------------

Total Outstanding Case Balances	\$0.00
--	---------------

Outstanding Holds:

Start Date	Description	Case	Agency	County	Total Debt	Paid to Date	Balance Owed
------------	-------------	------	--------	--------	------------	--------------	--------------

Total Outstanding Case Holds	\$0.00
-------------------------------------	---------------

Outstanding Investments / EPC:

Investment Type	Investment Type Description	Invest Company	Company Description	Balance
-----------------	-----------------------------	----------------	---------------------	---------