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CC-41-2025-C-328
Raleigh County Circuit Clerk
Brianne Steele

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

CHRISTOPHER ADAM JACKSON,

Plaintiff,

v.

ALAN DAVID ABRAMS,

Defendant.

Civil Action No. 25-C-328
Judge Poling

DEFENDANT'S MOTION FOR RULE TO SHOW CAUSE

COMES NOW the Defendant, Alan David Abrams, with a Motion for Rule to Show Cause, stating as follows:

1. As he has done in multiple cases in federal and state courts, the Plaintiff filed an affidavit of indigency in this case, claiming that he has no source of income. **Exhibit A.**

2. The Defendant has learned that as of 2019, the Plaintiff was receiving monthly Supplemental Security Income benefits in the amount of $783.00. **Exhibit B**.

3. Despite this, the Plaintiff has affirmatively represented to this Court (as well as to other courts) that he is not receiving such benefits:

1a. What is your current **yearly** net (take-home) income from **all** sources:

Employer:	$ 0	Second Job:	$ 0	Self-Employment:	$ 0
Public Assistance:	$ 0	Food Stamps:	$ 0	Unemployment:	$ 0
Benefits:	$ 0	Disability Benefits:	$ 0	Social Security/SSI:	$ 0
Alimony:	$ 0	Pensions:	$ 0	Rental Income:	$ 0
Interest:	$ 0	Dividends:	$ 0	Annuities:	$ 0
Odd Jobs:	$ 0	Other:	$ 0	(specify):	
YEARLY TOTAL:	$0.00				

4. The Supreme Court form required the Plaintiff to substantiate any allegation that he had no source of income when he filed the complaint in this case because, as a practical matter,

anyone's claim to have no source of yearly income from all sources is inherently suspect:

Please remember to attach financial documents which verify this information.

1b. If your listed income is zero (0), please explain below and attach some verification (i.e. DHHR or food stamp information):

0

2a. List the names and relationships to you of all the persons supported by this income, whether or not they are household members (provided, that these persons can be claimed as dependents on your federal tax return):

0

2b. What is the total number of dependents, including yourself ? 1

3. How much money do you, individually or jointly, have in cash, checking and savings accounts, deposit certificates, and/or bonds (**liquid assets**)? $ 0

5. Obviously, if someone lists their annual income from all sources as "zero," one would anticipate the receipt of governmental benefits, e.g., food stamps, that will substantiate an affidavit claiming the affiant had no annual income, but the Plaintiff here failed to do so.

6. Moreover, a logical question is how the Plaintiff pays the following monthly expenses listed in his affidavit if he has no annual income from any source and receives no governmental benefits:

4a. List your regular **monthly** household debt-payment and other expenses:

Mortgage/Rent:	$ 0	Car Payment:	$ 0	Loan Payments:	$ 0
Credit Card Payments:	$ 0	Other Debt Payments:	$ 0	Utilities:	$ 0
Cell Phone:	$ 15	Food:	$ 300	Child Care:	$ 0
Child Support:	$ 0	Alimony:	$ 0	Medical Bills:	$ 0
Other Expenses:	$ 0	(specify):			

4b. What is the total amount of these monthly expenses? $ 0.00

7. The Plaintiff also claims in his affidavit that he owns no taxable or real personal property: