

CASE NO. _____

SUPREME COURT OF THE UNITED STATES

MICHAEL J. KHOURY,)	
)	
Petitioner,)	On Petition for Writ of
)	Certiorari to the United
vs.)	States Court of Appeals
)	for the Seventh Circuit
UNITED STATES OF AMERICA,)	
)	
Respondent)	

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

COMES NOW Petitioner Michael J. Khoury, by court-appointed counsel, Todd M. Schultz, and requests that the Court permit Petitioner to proceed in forma pauperis with regard to this Petition for Certiorari which is being filed on his behalf.

Undersigned counsel is a member of the Federal Public Defender's Office for the Southern District of Illinois. The Federal Public Defender's Office for the Southern District of Illinois was appointed by the United States District Court for the Southern District of Illinois to represent the Petitioner pursuant to the provisions of the Criminal Justice Act, 18 U.S.C. § 3006A. Undersigned counsel was appointed to represent the Petitioner by the United States Court of Appeals for the Seventh Circuit in proceedings before that Court, also pursuant to 18 U.S.C. § 3006A. Undersigned counsel represented Petitioner during these proceedings.

Undersigned counsel knows of no change in circumstances which would affect the courts' earlier determinations that Petitioner should be granted leave to proceed in forma pauperis.

WHEREFORE, for the above stated reasons and pursuant to Rule 39 of the Supreme Court Rules, Petitioner requests that he be granted leave to proceed in forma pauperis.

Respectfully submitted,

/s/ Todd M. Schultz

TODD M. SCHULTZ

Assistant Federal Public Defender

650 Missouri Ave., Room G10-A

East St. Louis, IL 62202

(618) 482-9050

(618) 482-9057 (FAX)

Todd_Schultz@fd.org

ATTORNEY FOR PETITIONER