

**SUPREME COURT OF THE UNITED STATES**

**TARSIS GUILLERMO SANCHEZ-MORA**  
Petitioner

**v.**

**UNITED STATES OF AMERICA**  
Respondent

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

Pursuant to Rule 39, Petitioner respectfully seeks leave to proceed *in forma pauperis* and file the accompanying Petition for Writ of Certiorari without prepayment of costs. In support of this motion, counsel states as follows:

1. Mr. Sanchez-Mora has been incarcerated continuously from the beginning of these proceedings.
2. Mr. Sanchez-Mora is indigent and unable to pay the costs of an attorney or the costs associated with any court proceedings. The lower court so found when it appointed undersigned counsel to represent him pursuant to the Criminal Justice Act. *United States v. Sanchez-Mora*, First Circuit Court of Appeals, No. 16-1527, Order of June 1, 2016. Pursuant to Rule 39(1), a copy of the Order is attached.

WHEREFORE Petitioner respectfully requests that he be allowed to proceed *in forma pauperis*.

Date: December 16, 2019

/s/ *Theodore M. Lothstein*  
*Counsel of Record*  
Lothstein Guerriero, PLLC  
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Concord, NH 03301  
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# United States Court of Appeals For the First Circuit

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No. 16-1527

UNITED STATES,

Appellee,

v.

TARSIS GUILLERMO SANCHEZ-MORA, a/k/a Guillermo Sanchez-Mora, a/k/a Guillo,  
Defendant - Appellant.

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## ORDER OF COURT

Entered: June 1, 2016  
Pursuant to 1st Cir. R. 27.0(d)

Appellant's request for appointment of new counsel on appeal is granted. Attorney Theodore M. Lothstein is appointed as counsel under the guidelines of the Criminal Justice Act, 18 U.S.C. § 3006A.

Attorney Diego H. Alcala-Laboy is allowed to withdraw as counsel and is directed to forward the case record to Attorney Lothstein at Lothstein Guerriero PLLC, 3 N Spring St, Ste 101, Concord, NH 03301, 603-513-1919, and provide proof of such service to this court by **June 15, 2016**.

On or before **June 22, 2016**, Attorney Lothstein must file the docketing statement and a transcript order form, accompanied by a CJA 24 voucher.

By the Court:

/s/ Margaret Carter, Clerk.

cc:

Diego H. Alcala-Laboy, Tarsis Guillermo Sanchez-Mora, Victor O. Acevedo-Hernandez, Mariana E. Bauza Almonte, Alberto R. Lopez Rocafort, Marie Christine Amy, Theodore M. Lothstein