

No. \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES  
October 2019 Term

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FRANKIE BEQIRAJ,  
Petitioner,

v.

UNITED STATES,  
Respondent.

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ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

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

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Petitioner Frankie Beqiraj, by his attorney, Beverly Van Ness, Esq., respectfully moves for leave to proceed *in forma pauperis* in connection with the above-captioned petition for *certiorari*. Petitioner was granted leave to proceed *in forma pauperis* in the United States District Court for the Southern District of New York, and in the United States Court of Appeals for the Second Circuit. Ms. Van Ness was appointed by the Second Circuit Court of Appeals pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A *et seq.*, to represent petitioner on direct

appeal, and her appointment is continued for purposes of this petition for *certiorari*.

WHEREFORE, it is respectfully requested that Frankie Beqiraj be granted leave to proceed *in forma pauperis* in these proceedings.

Dated: January 23, 2020

Respectfully submitted,

Beverly Van Ness  
Beverly Van Ness  
Appointed Attorney for  
Petitioner Frankie Beqiraj  
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