

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES
October 2019 Term

FRANKIE BEQIRAJ,
Petitioner,

v.

UNITED STATES,
Respondent.

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

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

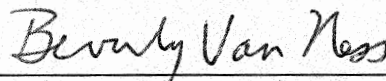
Petitioner Frankie Beqiraj, by his attorney, Beverly Van Ness, Esq., respectfully moves for leave to proceed *in forma pauperis* in connection with the above-captioned petition for *certiorari*. Petitioner was granted leave to proceed *in forma pauperis* in the United States District Court for the Southern 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
Appointed Attorney for
Petitioner Frankie Beqiraj
233 Broadway, Suite 2704
New York, New York 10279
(212) 274-0402

TO: The Solicitor General of
the United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Room 5616
Washington, DC 20530-0001