

OCTOBER TERM 2020

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

**ALFRED BOURGEOIS,
Petitioner,**

v.

**T.J. WATSON, Warden, USP-Terre Haute, and UNITED STATES OF AMERICA,
Respondents.**

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Seventh Circuit

MOTION FOR LEAVE TO FILE IN FORMA PAUPERIS

**--- CAPITAL CASE ---
EXECUTION SCHEDULED FOR DECEMBER 11, 2020**

Petitioner Alfred Bourgeois, through undersigned counsel, moves pursuant to Supreme Court Rule 39.1 for leave to proceed in forma pauperis in his concurrently-filed Petition for Writ of Certiorari. Petitioner is indigent: he has been granted appointed counsel throughout the proceedings below.

On October 16, 2006, the United States District Court for the Southern District of Texas appointed counsel from the Federal Community Defender Office for the Eastern District of Pennsylvania (FCDO), including the undersigned counsel Victor

J. Abreu, to represent Petitioner. FCDO counsel have represented Mr. Bourgeois throughout the proceedings held pursuant to 28 U.S.C. § 2255 in *United States v. Bourgeois*, No. 02-cr-216 (S.D. Tex.). The FCDO's representation of Mr. Bourgeois continued into the appeal that followed the denial of his § 2255 motion, litigation conducted in connection with the manner of his execution, *see In the Matter of the Fed. Bureau of Prisons' Execution Protocol Cases*, No. 19-mc-145 (D.D.C.) (consolidated case) and No. 12-cv-782 (original action), and the proceedings held pursuant to 28 U.S.C. § 2241 that are the subject of his Petition for Writ of Certiorari and detailed therein. A copy of the appointment order is attached as Exhibit A.

Undersigned counsel hereby certifies that Mr. Bourgeois is incarcerated and remains indigent. Mr. Bourgeois respectfully requests that this Court allow him to proceed in forma pauperis.

Respectfully submitted,

/s/ Victor J. Abreu
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**Counsel of Record for Petitioner and
Member of the Bar of the Supreme Court*

Dated: December 2, 2020