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IN THE
SUPREME COURT OF THE UNITED STATES

Andre Reese,
Petitioner,

v.

United States of America,
Respondent.

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

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The Petitioner, Andre Reese, by and through his court-appointed counsel, Kathleen Shen, Assistant Federal Public Defender for the Districts of Colorado and Wyoming, respectfully requests that this Honorable Court grant him leave to proceed *in forma pauperis* in petitioning for a Writ of Certiorari. In support of this request, Petitioner states that undersigned counsel was appointed pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A, by the United States Court of Appeals for the Tenth

Circuit, and that he is unable to retain counsel and pay for costs attendant to proceedings before this Honorable Court.

For these reasons, Petitioner Andre Reese respectfully requests that he be granted leave to proceed *in forma pauperis*.

/s/ Kathleen Shen
KATHLEEN SHEN
Assistant Federal Public Defender