

NO. 24-\_\_\_\_

IN THE  
Supreme Court of the United States

KEON LEE  
*Petitioner*

v.

UNITED STATES OF AMERICA  
*Respondent*

---

**On Petition for Writ of Certiorari from the  
United States Court of Appeals for the  
Sixth Circuit**

---

**PETITION FOR WRIT OF CERTIORARI**

JOHN KEVIN WEST  
*Counsel of Record*  
DALLAS F. KRATZER III  
STEPTOE & JOHNSON PLLC  
41 S. High Street, Suite 2200  
Columbus, OH 43215  
614.458.9889  
kevin.west@steptoe-johnson.com  
dallas.kratzer@steptoe-johnson.com

*Counsel for Petitioner Keon Lee*

**MOTION TO PROCEED *IN FORMA PAUPERIS***

Now comes Petitioner Keon Lee, by his court-appointed counsel, and in accordance with Rules 33.2 and 39 of the United States Supreme Court, moves to proceed before this Court *in forma pauperis*. In support of this Motion, the Petitioner states as follows:

1. Petitioner is unable to afford the cost of representation in this matter.
2. The undersigned counsel represented Petitioner in the underlying courts, United States Court of Appeals for the Sixth Circuit and the United States District Court for the Eastern District of Kentucky, through the Criminal Justice Act program.
3. Because of his continuing inability to afford counsel, Petitioner hereby requests *in forma pauperis* representation by Mr. West in his petition before this Court.

WHEREFORE, Petitioner by and through undersigned counsel respectfully requests that he be allowed to proceed *in forma pauperis* without payment of filing fees or service of notice fees and for such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ John Kevin West

John Kevin West (KY #81802)  
STEPTOE & JOHNSON PLLC  
41 South High Street, Suite 2200  
Columbus, Ohio 43215  
(614) 458-9889 phone  
(614) 221-0952 fax  
kevin.west@steptoe-johnson.com

*Counsel for Petitioner Keon Lee*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on June 5, 2024, the foregoing was served via e-mail upon the following:

Charles P. Wisdom Jr.  
United States Attorney  
260 W. Vine Street, Suite 300  
Lexington, KY 40507-1612  
Charles.Wisdom@usdoj.gov

/s/ John Kevin West

John Kevin West