In the Supreme Court of the United States

October Term, 2024

Donald Turner

Petitioner,
v.

United States of America, Respondent.

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

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

The Petitioner, DONALD TURNER, requests leave to file the annexed Petition for a Writ of Certiorari to the United States Supreme Court for the First Circuit without prepayment of costs and to proceed *in forma pauperis* pursuant to Rule 39. In the United States Court of Appeals for the First Circuit, the Court appointed counsel under the Criminal Justice Act of 1964, 18 U.S.C. Section 3006A, to represent Petitioner.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 31, 2025

_/s/ Vivian Shevitz Donald Turner by CJA counsel Vivian Shevitz 322 E. Harrison Ave. # 5 Royal Oak, MI 48067 914-763-2122 vivian@shevitzlaw.com