

IN THE  
SUPREME COURT OF THE UNITED STATES

BENJIE WRIGHT,  
Petitioner,

vs.

Number

UNITED STATES OF AMERICA  
Respondent.

---

**MOTION FOR LEAVE TO PROCEED**  
**IN FORMA PAUPERIS**

COMES NOW the petitioner, BENJIE WRIGHT, by and through undersigned counsel and pursuant to Sup. Ct. R.39, and moves this Honorable Court for leave to file the attached Petition for Certiorari in the Supreme Court of the United States without costs and to proceed in forma pauperis.

In the lower courts, the Petitioner was formally adjudicated unable to afford counsel and undersigned counsel was appointed for her under 18 U.S.C. Section 3006(a) of the Criminal Justice Act; accordingly, the Petitioner has not attached an affidavit of insolvency.

Respectfully Submitted,

s/Gregory A. Samms  
GREGORY A. SAMMS, ESQ.  
Counsel for Petitioner  
113 Almeria Avenue  
Coral Gables, FL 33134  
(786) 953-5802 (tel)  
(786) 513-3191 (fax)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail upon The Solicitor General, United States Department of Justice, Washington, D.C. 20530 and upon all counsel of record, this 16th day of November, 2017.

---

Gregory A. Samms, Esq  
Florida Bar No. 438863