

**No. 24-1328**

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In the  
Supreme Court of the United States

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UNITED STATES OF AMERICA,  
PETITIONER,

V.

KESHON DAVEON BAXTER,  
RESPONDENT,

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**Motion for Leave to Proceed In Forma Pauperis**

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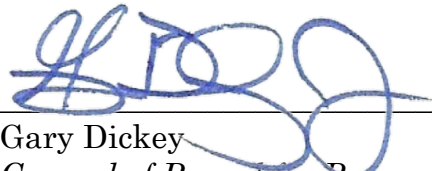
Gary Dickey  
*Counsel of Record for Respondent*  
DICKY, CAMPBELL, & SAHAG LAW FIRM, PLC  
301 E. Walnut Street, Suite 1  
Des Moines, Iowa 50309  
Tel: 515.288.5008  
gary@iowajustice.com

Pursuant to Rule 39 of the Rules of this Court, the petitioner, Keshon Baxter, requests leave to file the attached Brief in Opposition without prepayment of costs and to proceed *in forma pauperis*.

Mr. Baxter was represented by counsel appointed under the Criminal Justice Act, Title 18 U.S.C. section 3006(a). Attached to this motion is the order appointing counsel in the district court.

Wherefore, Respondent requests this Court grant his Motion for Leave to Proceed In Forma Pauperis.

Respectfully submitted,



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Gary Dickey  
*Counsel of Record for Respondent*  
DICKY, CAMPBELL, & SAHAG LAW FIRM, PLC  
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**PROOF OF SERVICE**

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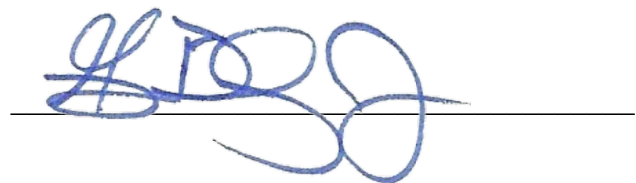
I, Gary Dickey, do swear or declare that on this date, September 11, 2025, as required by Supreme Court Rule 29, I have served the enclosed MOTION TO PROCEED IN FORMA PAUPERIS on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

Office of the Solicitor General, Room 5614  
Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530-0001  
(202) 514-2217

Andrew Kahl  
Assistant U.S. Attorney  
Neal Smith Federal Bldg  
210 Walnut Street, Ste 455  
Des Moines, Iowa 50309  
(515) 473-9300

Executed on September 11, 2025

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



**United States District Court  
Southern District of Iowa**

United States of America	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 4:23-mj-00428-HCA
	)	
Keshon Daveon Baxter	)	<input type="checkbox"/> [Check if Federal Public Defender is
,	)	appearing only for arraignment or
	)	initial appearance]
Defendant.	)	

**ORDER APPOINTING COUNSEL**

The Court finds that the Defendant qualifies for appointment of counsel under the Criminal Justice Act, 18 USC §3006A, and the Criminal Justice Act Plan for the Southern District of Iowa. A CJA Form 23 Financial Affidavit shall be filed within five days of this Order.

It is ORDERED that Federal Defender's Office, or substitute counsel designated pursuant to the CJA Plan, is appointed to represent Defendant for all proceedings, including appeal. The Court may require Defendant to make full or partial repayment of attorney and witness fees, should it find that the Defendant has the ability to make such payment.

Date: June 27, 2023

  
\_\_\_\_\_  
*Judge's signature*

William P. Kelly, U.S. Magistrate Judge  
\_\_\_\_\_  
*Printed name and title*