

No. _____

IN THE
Supreme Court of the United States

KIYEL TYQUELLO KEARNEY,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Fourth Circuit**

MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS*

The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed *in forma pauperis*.

The petitioner has previously been granted leave to proceed *in forma pauperis* in the following courts:

- (1) U.S. District Court for the Eastern District of Virginia, Case No. 1:24-cr-00004-PTG-1, by oral order entered November 21, 2023; and
- (2) U.S. Court of Appeals for the Fourth Circuit, Case No. 24-4370, by written order dated July 12, 2024.

Because appellate counsel was appointed pursuant to the Criminal Justice Act of 1964, 18 U.S.C. § 3006A, no affidavit or declaration of the petitioner is attached.

See S. Ct. R. 39.1.

Respectfully submitted,



Salvatore M. Mancina

Counsel of Record

Patrick L. Bryant

Shannon S. Quill

Assistant Federal Public Defenders

Office of the Federal Public Defender

for the Eastern District of Virginia

1650 King Street, Suite 500

Alexandria, VA 22314

(703) 600-0800

Sam_Mancina@fd.org

August 19, 2025