

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JOSEPH LEE BETANCOURT,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for Writ of Certiorari to the United States
Court of Appeals for the Fifth Circuit

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

Pursuant to Rule 39 and 18 U.S.C. § 3006A(d)(7), petitioner Joseph Lee Betancourt seeks leave to file the accompanying Petition for Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit without prepayment of costs, and to proceed in forma pauperis. Petitioner was represented by counsel appointed under the Criminal Justice Act, 18 U.S.C. § 3006A(b) and (c), in the United States District Court for the Southern District of Texas and on appeal to the United States Court of Appeals for the Fifth Circuit.

Date:
August 28, 2025

Respectfully submitted,

PHILIP G. GALLAGHER
Federal Public Defender
Southern District of Texas

s/ Evan G. Howze

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