

No. \_\_\_\_\_

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IN THE  
**SUPREME COURT OF THE UNITED STATES**

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**JEFFREY W. YOUNG, Jr.**  
**PETITIONER**

VS.

**UNITED STATES OF AMERICA**  
**RESPONDENT**

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

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The petitioner asks leave to file the attached petition for a writ of certiorari without prepayment of costs and to proceed In Forma Pauperis

Petitioner has previously been granted leave to proceed In Forma Pauperis in the Sixth Coircuit Court of Appeals/Western District of Tennessee (signed by Magistrate York on remand from the Sixth Circuit), and a copy of the order of appointment is appended.

DATED this 23rd Day of January, 2026.

Respectfully submitted,



/s/ Claiborne H. Ferguson  
Claiborne H. Ferguson  
*Appointed CJA Counsel*  
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#### CERTIFICATE OF SERVICE

I, Claiborne H. Ferguson, do swear or declare that on this date, January 23, 2026 as required by Supreme Court Rule 29, that I have served and enclosed 10 copies of the WRIT OF CERTIORARI with APPENDIX and MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS* on 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.

JOSHUA K. HANDELL  
Attorney, Appellate Section  
Criminal Division, Ste. 1515  
United States Department of Justice  
950 Pennsylvania Avenue N.W.  
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(202) 305-4244  
[joshua.handell@usdoj.gov](mailto:joshua.handell@usdoj.gov)

Executed on January 23, 2026.

/s/ Claiborne H. Ferguson  
Claiborne H. Ferguson

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

JEFFREY W. YOUNG, Jr.

v.

Case No. 1:19-cr-10040-JTF

UNITED STATES OF AMERICA

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**ORDER GRANTING DEFENDANT'S MOTION TO DECLARE DEFENDANT  
INDIGENT FOR APPEAL**

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The Motion to Declare Defendant, Jeffrey W. Young, Jr., Indigent for Appeal (Docket Entry 344) came to be heard before Magistrate Judge Jon A. York on May 16, 2024. The government has no objections to the Defendant's Motion to Declare Defendant Indigent. Upon the motion and the sworn testimony of Defendant regarding his financial status, the Court finds Defendant qualifies for Court appointment counsel and hereby appoints Claiborne Ferguson from the Criminal Justice Association Panel for continuity of counsel, Nunc Pro Tunc to April 29, 2024.

IT IS SO ORDERED this 16th day of May, 2024.

s/ Jon A. York  
**UNITED STATES MAGISTRATE JUDGE**