

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

JEFFREY W. YOUNG, Jr.
PETITIONER

VS.

UNITED STATES OF AMERICA
RESPONDENT

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

Petitioner has previously been granted leave to proceed In Forma Pauperis in the Sixth Circuit 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,



Ferguson McNeil Law Firm, P.A.
REPRESENT

/s/ Claiborne H. Ferguson
Claiborne H. Ferguson
Appointed CJA Counsel
294 Washington Avenue
Memphis, Tennessee 38103
Tel.: (901) 529-6400
Fax: (901) 202-2053
Email: Claiborne@midsouthcriminaldefense.com

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
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Criminal Division, Ste. 1515
United States Department of Justice
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Washington, DC 20530
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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

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

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