SUPREME COURT OF THE UNITED STATES

X----------X
Juan Tacuri,
Petitioner,

v. No._____

United States of America,
Respondent.
X----------X

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Petitioner, Juan Tacuri, respectfully requests leaves to file the annexed Petition for Writ of Certiorari without payment of costs and to proceed *in forma pauperis* pursuant to United States Supreme Court Rule 39. Mr. Tacuri was granted leave to proceed *in forma pauperis* in the underlying proceedings in the United States Court of Appeals for the Second Circuit. Brian A. Jacobs was appointed pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A, et seq., to represent Mr. Tacuri for his direct appeal in the Court of Appeals for the Second Circuit. That representation is continued for purposes of this petition for certiorari review.

WHEREFORE, it is respectfully requested that Juan Tacuri be granted leave to proceed without payment of costs and *in forma pauperis* in these proceedings.

Dated: October 27, 2026
New York, New York

MORVILLO ABRAMOWITZ GRAND IASON
& ANELLO P.C.

By: */s/ Brian A. Jacobs*
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