

No. 22-336

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IN THE  
**Supreme Court of the United States**

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JASON REED,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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ON PETITION FOR A WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE TENTH CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 22nd day of December 2022, that the Reply Brief for Petitioner in the above-captioned case contains 2,657 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Michael R. Dreeben*

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Michael R. Dreeben