## IN THE

## Supreme Court of the United States

LOUIS MCINTOSH,

Petitioner,

v.

UNITED STATES,

Respondent.

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

## REPLY BRIEF FOR PETITIONER

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,976 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sworn to and subscribed before me this 9th day of February 2024.

ALAN JAMES SMITH

NOTARY PUBLIC.

District of Columbia

My commission expires September 30, 2027.

