

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

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BRANDON MICHAEL COUNCIL,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**On Petition for Writ of Certiorari to the United  
States Court of Appeals for the Fourth Circuit**

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**REPLY IN SUPPORT OF PETITION FOR A  
WRIT OF CERTIORARI**

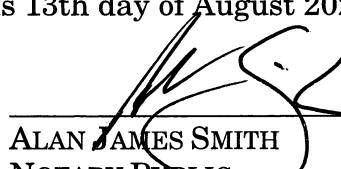
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,935 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 13th day of August 2024.

  
ALAN JAMES SMITH  
NOTARY PUBLIC  
District of Columbia

My commission expires September 30, 2027.

