

No. 24-1066

In the Supreme Court of the United States

Sam Sarkis Solakyan,
Petitioner,

v.

United States,
Respondent.

**On Petition for a Writ of Certiorari to the
U.S. Court of Appeals for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the Reply Brief contains 2,900 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.

Executed on July 10, 2025.

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