IN THE

SUPREME COURT OF THE UNITED STATES

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DAVID SCHIEFERLE,

Petitioner

v.

UNITED STATES OF AMERICA,

Respondent

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,835 words, excluding the parts of the petition 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 29, 2024,

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