

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

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JAY A. LIESTMAN,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

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

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Jeffrey L. Fisher, a member of the bar of this Court, certify on this 17th day of December, 2024, that the Reply Brief for Petitioner in the above-captioned case contains 2,776 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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*/s/ Jeffrey L. Fisher*  
Jeffrey L. Fisher