

No. 24-286

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In the Supreme Court of the United States

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PETER BOLOS, PETITIONER

*v.*

UNITED STATES OF AMERICA

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

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MEMORANDUM FOR THE UNITED STATES

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ELIZABETH B. PRELOGAR  
*Solicitor General*  
*Counsel of Record*  
*Department of Justice*  
*Washington, D.C. 20530-0001*  
*SupremeCtBriefs@usdoj.gov*  
*(202) 514-2217*

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## MEMORANDUM FOR THE UNITED STATES

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Petitioner challenges his mail-fraud conviction, arguing that his conduct was not federal property fraud. He asks (Pet. 9-10) to have the petition for a writ of certiorari held pending the Court's decision in *Kousisis v. United States*, cert. granted, No. 23-909 (June 17, 2024), which will address whether a conviction under the federal property-fraud statutes requires proof of net pecuniary loss. The Court's resolution of that issue in *Kousisis* could potentially affect the judgment below. Accordingly, this Court should hold the petition for a writ of certiorari pending its decision in *Kousisis* and then dispose of this petition as appropriate.\*

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\* The government waives any further response to the petition for a writ of certiorari unless this Court requests otherwise.

(1)

Respectfully submitted.

ELIZABETH B. PRELOGAR  
*Solicitor General*

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