

No. 21-568

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

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JASON JARVIS,

*Petitioner,*

v.

THE UNITED STATES OF AMERICA,

*Respondent.*

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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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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 22nd day of December 2021, that the Reply Brief for Petitioner in the above-captioned case contains 2,902 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Michael R. Dreeben*  
Michael R. Dreeben