IN THE

Supreme Court of the United States

DAVID LESH,

Petitioner,

v.

UNITED STATES,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Tenth Circuit

BRIEF OF CRIMINAL LAW PROFESSORS ANDREA ROTH AND J.D. KING AS AMICI CURIAE IN SUPPOR T OF PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,674 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.

Sworn to and subscribed before me this 16th day of January/2025

AZA SALINDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.

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