

In the Supreme Court of the United States

FRED DAVIS CLARK, JR.,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF COMPLIANCE

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I HEREBY CERTIFY that the reply brief in the above-captioned case contains 2,979 words, excluding those parts of it that are exempted. *See* Sup. Ct. R. 33.1(g)–(h). This certificate was prepared in reliance on Microsoft Word’s word-count function. I declare under penalty of perjury that the foregoing is true and correct.

August 4, 2026

/s/ Thomas Burns

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