

IN THE
SUPREME COURT OF THE UNITED STATES

MARK A. PITZKA,
Petitioner,

v.

STATE OF WISCONSIN,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 5,223 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Dated at Milwaukee, Wisconsin, this 13th day of May, 2026.

By: _____


JASON D. LUCZAK

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