

No. \_\_\_\_\_

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IN THE SUPREME COURT OF THE UNITED STATES

JAE MICHAEL BERNARD

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent,

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ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT  
OF APPEALS FOR THE EIGHTH CIRCUIT

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CERTIFICATE OF COMPLIANCE

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Respectfully submitted,

STOWERS & NELSEN, PLC  
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I, James Nelsen, hereby certify that the Petition for a Writ of Certiorari complies with type-volume limit of Rule 33.2 because it contains 12 pages and contains 2,315 words, including footnotes. I have relied on the word count of the word-processing system.

Dated: August 5, 2025.

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By: /s/ James Nelsen  
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