

In the Supreme Court of the United States



JEFFREY ANDREWS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI
To THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the *Brief of Amici Curiae States of West Virginia, Nebraska, and 21 Other States In Support Of Petitioner* contains 5,965 words, excluding the parts of the brief that are exempt by Supreme Court Rule 33.1(d)

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

Executed on January 8, 2026.

A handwritten signature in blue ink, appearing to read "Caleb B. David".

Caleb B. David
Deputy Solicitor General
Counsel of Record

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