

In the Supreme Court of the United States

JEFFREY ANDREWS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

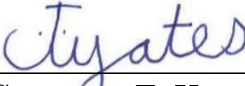
*On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Second Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI contains 2,988 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.

Executed on May 4, 2026.



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