

In the Supreme Court of the United States

GREGORY W. PHEASANT,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF PACIFIC LEGAL FOUNDATION AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER contains 5,971 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 March 27, 2026.



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