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ROSENBERG, TX 77471-5985
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No. _____

In the Supreme Court of the United States

JEFFREY STEVEN CLAY,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE AND SERVICE

Pursuant to S. Ct. R. 33.1(h), I certify that the petition for writ of certiorari contains 3,667 words, excluding parts exempted by S. Ct. R. 33.1(d).

Pursuant to S. Ct. R. 29.2, I certify that 40 copies in booklet format of the petition for writ of certiorari and the accompanying appendices are sent to the Clerk of the Supreme Court of the United States through the United Parcel Service via Next Day Air postage prepaid, and was picked up by the United Parcel Service on this 20th day of January, 2026.

Lastly, I certify pursuant to S. Ct. R. 29.5(c), 3 copies of the petition for writ of certiorari and the accompanying appendices are served all parties required to be served have been served via email and United States Postal Service via Priority Mail postage prepaid, this 20th day of January, 2026.

[See attached service list]

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

Executed on January 20, 2026



Huang Tiange

President

United States Commercial Printing Company

24200 Southwest Fwy, Ste 402-259

Rosenberg, TX 77471-5985

huangtiange@uscpc.us

(202) 866-8558



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