

No. 25-905

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IN THE  
**Supreme Court of the United States**

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ANDREW J. JOHNSTON,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Reply to Brief in Opposition in *Johnston v. United States*, No. 25-905, complies with the word limitations, as it contains 2,267 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: April 27, 2026

  
Anthony J. Dick