

No. 23-401

IN THE
Supreme Court of the United States

MICHAEL CAREY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 1,907 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: April 9, 2024

/s/ Allyson N. Ho

Allyson N. Ho