

No. \_\_\_\_\_

---

**In The**  
**SUPREME COURT OF THE UNITED STATES**

OCTOBER TERM, 2023

\_\_\_\_\_  
BRIAN K. ALLEN, *Petitioner*,

**v.**

UNITED STATES OF AMERICA, *Respondent*.

\_\_\_\_\_  
**CERTIFICATE OF COMPLIANCE**

Pursuant to United States Supreme Court Rule 33.1(h) I hereby certify that the petition for certiorari filed in the above action on behalf of petitioner Brian K. Allen contains 3133 words

Dated this 27<sup>th</sup> day of December, 2023,

\_\_\_\_\_  
Jeremy B. Lowrey  
Arkansas Bar No. 2002153  
6834 Cantrell Road, PMB 3027  
Little Rock, AR 72207  
(870) 329-4957  
Facsimile No: (479) 222-1459

ATTORNEY FOR PETITIONER  
BRYAN K. ALLEN