

No. _____

IN THE
Supreme Court of the United States

OLE HOUGEN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit

CERTIFICATE OF WORD COUNT

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Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Petition for Writ of Certiorari, which was prepared using Century 12-point typeface containing 7,903 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word Pro 2016) used to prepare the document.

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

Executed on February 1, 2024, at San Jose, California.

Respectfully submitted,

February 1, 2024

s/ Lara S. Vinnard

LARA S. VINNARD
Assistant Federal Public Defender