

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

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

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OLE HOUGEN,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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

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**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 Certiori, 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*

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LARA S. VINNARD  
Assistant Federal Public Defender