

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

October Term, 2023

ALISON LEE GENDREAU,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 2,712 words, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

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

DATED this 14th day of February, 2024.

Respectfully submitted,

/s/ MICHAEL DONAHOE
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