

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

MARK EDMOND BROWN, JR.,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COMPLIANCE

Pursuant to Supreme Court Rule 33.1 (h), I certify that the *pro se* petition for a writ of certiorari contains 4,375 words, including the parts of the document exempted by Supreme Court Rule 33.1 (d).

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

/s/ Mark Brown, w.o.f
Mark Edmond Brown, Jr.

Dated May 11, 2024