

No. 24-1084
IN THE
Supreme Court of the United States

STEVEN M. HOHN,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,572 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on May 19, 2025.

/s/ Douglas E. Litvack
Douglas E. Litvack