

SUPREME COURT OF THE UNITED STATES

No.

-----X

MARLO HELMSTETTER

*Petitioner,*

*v.*

THE UNITED STATES OF AMERICA

*Respondent,*

-----X

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,590 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 this 15<sup>th</sup> day of July, 2024.



Ann Tosal

Sworn to and subscribed before me  
on this 15<sup>th</sup> day of July, 2024.



**MARIANA BRAYLOVSKIY**

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026