

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

\_\_\_\_\_  
IN THE

SUPREME COURT OF THE UNITED STATES  
\_\_\_\_\_

\_\_\_\_\_  
**UNITED STATES OF AMERICA,**  
*Respondent,*

**vs.**

**WARREN ALEXANDER,**  
*Petitioner.*  
\_\_\_\_\_

**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 1393 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 July 29, 2024.

*Jeremiah Donovan*  
\_\_\_\_\_  
JEREMIAH DONOVAN