

In the Supreme Court of the United States

DAVID HOUSTON VARGAS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jessica Stengel, a member of the bar of this Court, certify on this 18th day of September 2024, that the Petitioner's Supplemental Brief in the above-captioned case contains 639 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.2.

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