

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 24-6158

ELDEN DON BRANNAN,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Evan G. Howze, certify that the Reply Brief in the foregoing case contains 2,974 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 7, 2025.

/s/Evan G. Howze

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