

SUPREME COURT OF THE UNITED STATES

No. 24-

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ZACKARY ELLIS SANDERS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

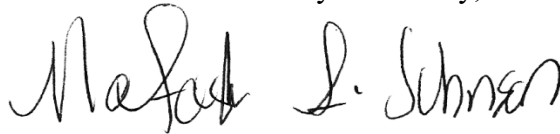
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CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h),
I certify that the document contains 3983 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 15th day of January, 2025



Natasha S. Johnson

Sworn to and subscribed before me this 15th day of January, 2025



MARIANA BRAYLOVSKIY

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2026