

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-972

FRANK BELL; TYSON RHAME; JAMES SHAW,
PETITIONERS

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for petitioner Frank Bell and a member of the Bar of this Court, certify that the Reply Brief for the Petitioners in the above-captioned case contains 2,012 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

June 10, 2025