## No. 24-1056

## IN THE

## Supreme Court of the United States

ISABEL RICO,

Petitioner,

v.

UNITED STATES OF AMERICA, Respondent.

## CERTIFICATE OF WORD COUNT

I, Adam G. Unikowsky, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Supreme Court Rule 33.1(h) that the Brief for Petitioner in the above-captioned case contains **12,983** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: August 14, 2025 /s/ Adam G. Unikowsky

Adam G. Unikowsky