

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 Reply Brief for Petitioner in the above-captioned case contains **6,000** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: October 15, 2025

/s/ Adam G. Unikowsky
Adam G. Unikowsky