

No. 25-108  
IN THE  
**Supreme Court of the United States**

DONALD WAYNE BUSH AND KIMBERLY ANN BUSH,  
*Petitioners*,  
v.  
UNITED STATES OF AMERICA,  
*Respondent*.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,987 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 November 10, 2025.

/s/ Eugene R. Wedoff  
Eugene R. Wedoff