

SUPREME COURT OF THE UNITED STATES

No. \_\_\_\_

-----X

ALEXANDER GALLO,

*Petitioner,*

*v.*

DISTRICT OF COLUMBIA,

*Respondent,*

-----X

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,137 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 5<sup>th</sup> day of September, 2025.



\_\_\_\_\_  
Ann Tosel

Sworn to and subscribed before me  
this 5<sup>th</sup> day of September, 2025.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026