RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-

KIRA KRISTINA ZIELINSKI,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Knut S. Johnson, certify that the Petition for Writ of Certiorari in the foregoing case contains 4,726 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 July 7, 2025.

/s/ Knut S. Johnson KNUT S. JOHNSON SINGLETON SCHREIBER, LLP 591 Camino de la Reina Suite 1025 San Diego, CA 92108 (619) 535-2929