

IN THE
Supreme Court of the United States

RICHARD RUSTON,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Tenth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Ephraim A. McDowell, certify that the Reply Brief for the Petitioner in the foregoing case contains 2,990 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2026.

/s/ Ephraim A. McDowell _____
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