

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JARRETT HOWARD Petitioner,

v.

UNITED STATES OF AMERICA, Respondent,

CERTIFICATE OF WORD COUNT

The petition for certiorari complies with the word limitations of Sup. Ct. R. 33. The petition contains 2,414 words.

Dated: December 9, 2025

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