

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 25-

GREGORY PHEASANT,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Ellese Henderson, certify that the Petition for a Writ of Certiorari in the foregoing case contains 4,686 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 February 20, 2026.

/s/ Ellese Henderson

ELLESSE HENDERSON

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