

No. _____

IN THE
Supreme Court of the United States

LEONARD J. HIGGINS,
Petitioner,
v.

UNITED STATES,
Respondent.

On Petition for a Writ of Certiorari
To the United States Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the document contains 8,570 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 September 3, 2026.

s/ Daniel P. Goldberg

Daniel P. Goldberg

Assistant Federal Public Defender

Counsel of Record

OFFICE OF THE FEDERAL PUBLIC DEFENDER
WESTERN DISTRICT OF MISSOURI

1000 Walnut St., Suite 600

Kansas City, MO 64106

(816) 471-8282

Dan_Goldberg@fd.org