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October 29, 2018

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

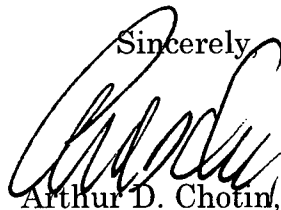
RE: JOSEPH RACHAL V. UNITED STATES

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains **3,350** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arthur D. Chotin', is written over the word 'Sincerely,'.

Arthur D. Chotin, Esq.
Principal