In the Supreme Court of the United States

MANUEL ENRIQUE SANTANA,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this petition for a writ of certiorari contains 4,743 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,

Andrew J. Pincus