No. 19-1414 In the Supreme Court of the United States

UNITED STATES OF AMERICA, PETITIONER,

v.

JOSHUA JAMES COOLEY, RESPONDENT.

CERTIFICATE OF COMPLIANCE

I, Eric R. Henkel, hereby certify that the document contains 3,732 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.

Respectfully submitted this 15^{th} day of October, 2020.

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