

## CERTIFICATE OF COMPLIANCE

No. \_\_\_\_\_

NARAY PALANIAPPAN,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent,*

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 5,623 words, excluding the parts of the petition 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 June 12, 2020

  
Zachary Margulis-Ohnuma