

IN THE SUPREME COURT OF THE UNITED STATES
October Term, 2019

MICHAEL TRYANCE ANDERSON,)
vs.)
Petitioner,) On Petition for Writ of
) Certiorari to the United
) States Court of Appeals
) for the Eighth Circuit
UNITED STATES OF AMERICA,)
Respondent.)

CERTIFICATION OF COMPLIANCE WITH WORD-COUNT LIMITATION

Scott F. Tilsen hereby affirms that the Petition for a Writ of Certiorari complies with the word-count limitations of Supreme Court Rule 33, in that the number of words contained in the petition is 5, 218.

Respectfully submitted,

/s/ Scott F. Tilsen
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