

No. _____

IN THE
Supreme Court of the United States

JOHN KELSEY GAMMELL,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE
WITH WORD COUNT LIMITATIONS

I, Rachel K. Paulose, counsel for petitioner appointed under the Criminal Justice Act, 18 U.S.C. § 3006A, certify that the Petition for a Writ of Certiorari in the case captioned *supra* contains 4,218 words, excluding the parts of the petition that are exempted by Rule 33.1(d).

I further certify that all parties required to be served have been served.

s/ Rachel K. Paulose
Rachel K. Paulose

January 6, 2020