

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