CERTIFICATE OF COMPLIANCE

No. 19-975

PAUL D. VOORHEES, Major, USAF,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief in Support of certiorari contains **2,953** words using WordPerfect's "Word Count" function, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I further certify that Century Schoolbook, 12 point font was used for all textual material and 10 point font for footnotes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd Day of March, 2020.

|eS| Donald G. Rehkopf, Jr.

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