

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

---

IN THE  
**Supreme Court of the United States**

---

MICHAEL COWELS AND MICHAEL MIMS,  
*Petitioners,*

v.

THE FEDERAL BUREAU OF INVESTIGATION,  
CHRISTOPHER WRAY, AND PAULA WULFF,  
*Respondents.*

---

On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the First Circuit

---

**CERTIFICATE OF COMPLIANCE**

---

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 20th day of December, 2019 that the Petition for a Writ of Certiorari contains 4405 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

  
\_\_\_\_\_  
David J. Apfel  
GOODWIN PROCTER LLP  
100 Northern Avenue  
Boston, MA 02210  
dapfel@goodwinlaw.com  
(617) 570-1000

*Counsel for Petitioner Michael Cowels*

December 20, 2019