

**CERTIFICATE OF COMPLIANCE**

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

FRANK RICHARDSON,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari of Petitioner contains 4,428 words of Century (12 point) proportionate type.

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

Executed on June 25, 2020

*s/Michael R. Dezsi*  
Michael R. Dezsi (P64530)