

CERTIFICATE OF COMPLIANCE

No. 21-

SCOTT PHILLIP FLYNN, *Petitioner*,

v.

UNITED STATES OF AMERICA, *Respondent*.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,799 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on February 11, 2021

IAN M. COMISKY