

**CERTIFICATE OF COMPLIANCE**

No. 20-1129

SCOTT PHILLIP FLYNN, *Petitioner*,

v.

UNITED STATES OF AMERICA, *Respondent*.

As required by Supreme Court Rule 33.1(h), I certify that the reply in support of petition for a writ of certiorari contains 2,983 words, excluding the parts of the document 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 June 7, 2021

---

IAN M. COMISKY