

No. 20-____

IN THE
Supreme Court of the United States

MARK RINGLAND,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari to the
U.S. Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Amir H. Ali, hereby certify that I am a member of the bar of this Court, and that the document contains 3,636 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: February 25, 2021

/s/ Amir H. Ali
Amir H. Ali
Counsel of Record for
Petitioner Mark Ringland