

No. 20-1204
IN THE
Supreme Court of the United States

MARK RINGLAND,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,656 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 April 14, 2021.

/s/ Jessica Ring Amunson
Jessica Ring Amunson