

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompany Petition for Writ of Certiorari in
Wylmina Hettinga v. United States of America complies with the word count
limitations of Supreme Court Rule 33(g) in that is contains 7,263 words
based upon the word-count function of Microsoft Word – Office 365 including
footnotes but excluding material not required to be counted by Rule 33(d).



Dated 05/21/2021

Wylmina Hettinga, Petitioner