

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-

Franqui Francisco Flores de Freitas,

Petitioner,

v.

United States of America *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Michael A. Levy, certify that the Petition for a Writ of Certiorari in the foregoing case contains 6,796 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 August 17, 2020.

/s/ Michael A. Levy
MICHAEL A. LEVY
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, NY 10019
(212) 839-5300