

**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  
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