

No. 20-437

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,

Respondent.

**On Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Bradley N. Garcia, a member of the bar of this Court, certify on this 24th day of March 2021, that the Brief of Respondent in the above-captioned case contains 12,596 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Bradley N. Garcia

Bradley N. Garcia