In The Supreme Court of the United States

DREW SAMUEL BATES.

Petitioner,

V. .

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the **PETITION FOR A WRIT OF CERTIORARI** in case contains 6,078 words, excluding 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 the 19th day of October 2020.

DAVID A. O'NEIL

801 PENNSYLVANIA AVE, SUITE 500

WASHINGTON, D.C. 20004

(202) 383-8000