

No. 20-5589

WALI ROSS,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner Wali Ross contains 3000 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ E. Joshua Rosenkranz
Counsel of Record