

**No. 20-5589**

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WALI ROSS,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent.*

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**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*