

IN THE SUPREME COURT OF THE UNITED STATES

No. \_\_\_\_\_

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SERGIO AVALOS,

Petitioner,

-v-

UNITED STATES OF AMERICA,

Respondent.

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 4,938 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



Dated: December 18, 2020

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