

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 20-6791

Alvin Christopher Penn,

*Petitioner*

v.

United States,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, J. Matthew Wright, certify that the Reply Brief of Petitioner in the foregoing case contains 2,920 words, excluding the parts of the document that are excluded by Supreme Court Rule 33.1(d).

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

Executed on March 24, 2021.

/s/ J. Matthew Wright

J. MATTHEW WRIGHT\*

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