

---

NO. \_\_\_\_\_

---

**IN THE UNITED STATES SUPREME COURT**

---

**OSCAR GUEVARA SALAMANCA,**

**Petitioner,**

**v.**

**UNITED STATES OF AMERICA,**

**Respondent.**

---

**CERTIFICATE OF COMPLIANCE**

---

The undersigned hereby certifies the Petition for Writ of Certiorari complies with the requirements of the type-volume limitation of Rule 33.1(g)(i), Supreme Court Rules, as it contains 5,185 words excluding the table of contents and the table of citations. Certification is based on the word count of the word-processing system used in preparing the Petition, Microsoft Word 2016.

This the 31st day of December, 2020.

/s/ Erin Rust

Erin P. Rust  
Assistant Federal Defender  
835 Georgia Avenue, Suite 600  
Chattanooga, Tennessee 37402  
(423) 756-4349