

CERTIFICATE OF COMPLIANCE

JAMES PETER SABATINO, Petitioner,

v.

UNITED STATES OF AMERICA, RESPONDENT.

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for Certiorari contains **5,082 words**, excluding the parts of the petition that are exempt by Supreme Court Rule 33.1(d).

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

Executed on this 19th day of February, 2021.

By: /s/ *Israel Jose Encinosa*

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