

No. 20-_____

**IN THE
SUPREME COURT OF THE UNITED STATES**

SAMUEL ALEX GANN,

Petitioner,

vs.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

The undersigned hereby certifies that the Petition for Certiorari complies with the requirements of the type-volume limitation of Rule 33.1(g)(i) and Rule 14.1(f), Supreme Court Rules, as it contains 4,643 words, excluding the question presented, list of parties, table of contents, table of citations, and the certificates of counsel. Certification is based on the word count of the word-processing system used in preparing this Petition, Microsoft Word.

This the 5th day of April, 2021.



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