

No. 20-7868

IN THE SUPREME COURT OF THE UNITED STATES

DOUGLAS KELLY
Petitioner

v.

UNITED STATES OF AMERICA
Respondent

CERTIFICATE OF WORD COUNT

The undersigned hereby certifies that this Brief contains 276 words according to the Word Count feature in Microsoft Word, which is within the word limit set forth in Federal Rules.

/s/ John F. Yaninek

**John F. Yaninek
Counsel for Respondent,
Maurice Atkinson**