No. 21	
IN THE Supreme Court of the United States	
Joseph Percoco,	
	Petitioner
v.	
UNITED STATES,	
	Respondent

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *Percoco v. United States*, No. 21-____, complies with the word limitations, as it contains 8,975 words.

CERTIFICATE OF COMPLIANCE

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

Date: February 17, 2022

Yaakov M. Roth