No. 21-1158

IN THE

Supreme Court of the United States

JOSEPH PERCOCO,

Petitioner,

V.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Petitioner in *Percoco v. United States*, No. 21-1158, complies with the word limitations, as it contains 12,970 words.

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

Date: August 31, 2022

Yaakov M. Roth