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 Reply Brief for Petitioner in *Percoco v. United States*, No. 21-1158, complies with the word limitations, as it contains 5,970 words.

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

Date: November 10, 2022 Yaakov M. Roth