

IN THE
Supreme Court of the United States

JANHOI COLE,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Seventh Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 18th day of February, 2022, that the Petition for a Writ of Certiorari in the above-captioned case contains 6,742 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben
Michael R. Dreeben
