## No. 21-1170 In the Supreme Court of the United States

LOUIS CIMINELLI,

Petitioner,

v.

UNITED STATES ET AL., Respondents.

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,889 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on September 6, 2022.

/s/ Adam G. Unikowsky Adam G. Unikowsky