

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1313

MARTIN GOTTFELD, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Reply Brief for the Petitioner in the above-captioned case contains 2,999 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel L. Geyser
Daniel L. Geyser

July 26, 2022