

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 21-1418

MEDARDO QUEG SANTOS,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, J. Thomas A. Burns, certify that the petitioner's reply brief in the foregoing case contains 2,955 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 27, 2022.

*/s/ Thomas A. Burns*

THOMAS A. BURNS\*  
BURNS, P.A.  
301 W. Platt St., Ste. 137  
Tampa, FL 33606  
(813) 642-6350  
tburns@burnslawpa.com