No. 21-1436

In the Supreme Court of the United States

LEON SANTOS-ZACARIA,

Petitioner,

v.

MERRICK GARLAND, U.S. ATTORNEY GENERAL,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief for petitioner contains 12,809 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

O Tufa

Paul W. Hughes