

## CERTIFICATE OF COMPLIANCE

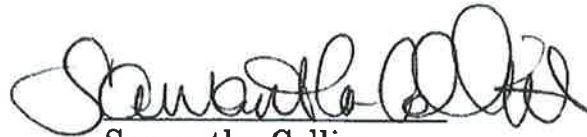
Case No. Gatto v. USA

Caption: 21-169

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,855 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 7, 2021.



Samantha Collins  
*Record Press, Inc.*

Sworn to before me on

September 7, 2021

NADIA R. OSWALD HAMID  
Notary Public, State of New York  
No. 01OS6101366  
Qualified in Kings County  
Commission Expires November 10, 2023



Notary Public