| •          |
|------------|
| Petitioner |
|            |
|            |
| Respondent |
|            |

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *Zupnik v. United States*, No. 21-\_\_\_, complies with the word limitations, as it contains 8,757 words.

CERTIFICATE OF COMPLIANCE

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

Date: August 3, 2021

Yaakov M. Roth