

No. 21-____

IN THE
Supreme Court of the United States

JASON JARVIS,

Petitioner,

v.

THE UNITED STATES OF AMERICA,

Respondent.

On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Sixth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 15th day of October 2021, that the Petition for A Writ of Certiorari in the above-captioned case contains 6,471 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben
Michael R. Dreeben