

No. 21-6770  
IN THE  
**Supreme Court of the United States**

DAVE ELYSEE,  
*Petitioner,*  
v.  
UNITED STATES OF AMERICA,  
*Respondent.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,796 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 February 7, 2022.

/s/ Douglas E. Litvack  
Douglas E. Litvack