## No. \_\_\_\_\_ IN THE Supreme Court of the United States

## BRENDON JANIS,

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 6,652 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 July 15, 2021.

/s/ Adam G. Unikowsky Adam G. Unikowsky