

No. 21-68  
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 2,984 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 October 22, 2021.

/s/ Adam G. Unikowsky  
Adam G. Unikowsky