

No. 21-6815

**IN THE
SUPREME COURT OF THE UNITED STATES**

**NOE FLORES-PEREZ,
*Petitioner,***

v.

**UNITED STATES of AMERICA,
*Respondent.***

CERTIFICATE OF COMPLIANCE

On January 6, 2022, as required by Supreme Court Rule 33.1(h), I, Colleen P. Fitzharris, certify that on the Reply Brief for Petitioner in the above-captioned case contains 2,832 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

FEDERAL COMMUNITY DEFENDER

By: /s/Colleen P. Fitzharris
613 Abbott St., Suite 500
Detroit, Michigan 48226
Telephone No. (313) 967-5542