

No. 21-_____

IN THE
Supreme Court of the United States

JOEL IVERSON GILBERT,

Petitioner,

v.

UNITED STATES OF AMERICA,


Respondent

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari in Gilbert v. United States of America, No. 21-_____, complies with the word limitations, as it contains 160 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: November 10, 2021



Jeffrey P. Doss
Counsel of Record