SUPREME COURT OF THE UNITED STATES No. 22-	v
MICHAEL JEROME FILES.,	Λ
Petitioner,	
v.	
UNITED STATES OF AMERICA,	
Respondent.	X
CERTIFICATE OF COMPLIANCE	Λ
As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,397 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 this 22 nd day of June, 2023	
	_

Candice Best

Sworn to and subscribed before me this 22^{nd} day of June, 2023

MARIANA BRAYLOVSKIY

Notary Public State of New York No. 01BR6004935 Qualified in Richmond County Commission Expires March 30, 2026

Mariana Braylovsby