

SUPREME COURT OF THE UNITED STATES

No. 22-1239

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MICHAEL JEROME FILES,

*Petitioner,*

*v.*

UNITED STATES OF AMERICA,

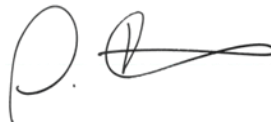
*Respondent,*  
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2990 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 30<sup>th</sup> day of October, 2023.



\_\_\_\_\_  
Simone Cintron

Sworn to and subscribed before me  
this 30<sup>th</sup> day of October, 2023.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026  
#324881