No. 22-49

IN THE

## Supreme Court of the United States

EFRAIN LORA,

Petitioner,

V.

UNITED STATES OF AMERICA,

Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Petitioner in *Lora v. United States*, No. 22-49, complies with the word limitations, as it contains 9,622 words.

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

Date: January 20, 2023

Andrew J.M. Bentz