RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-

JUSTIN RASHAAD BROWN,

Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the petition for a writ of certiorari in the foregoing case contains 6,181 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 December 21, 2022.

/s/ Jeffrey T. Green

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