In the Supreme Court of the United States

JEFFREY A. BENTLEY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Michael B. Kimberly, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this petition for certiorari contains 5,696 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Michael B. Kimberly