

IN THE SUPREME COURT OF THE UNITED STATES

---

No.

---

MICHAEL GRAMINS, PETITIONER

v.

UNITED STATES OF AMERICA

---

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

---

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 7,099 words, excluding the portions that are exempted by Rule 33.1(d).

---

Kannon K. Shanmugam

February 9, 2023