

In the Supreme Court of the United States

JEFFREY BATIO,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Seventh Circuit

CERTIFICATE OF COMPLAINECE

As required by Supreme Court Rule 33.1(h), I certify that
the document contains 7,823 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 June 14, 2024

/s/ Andrew T. Dufresne
Andrew T. Dufresne
Perkins Coie LLP