In the Supreme Court of the United States

CHRISTOPHER KINZY, PETITIONER

v.

UNITED STATES

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *Christopher Kinzy v. United States*, S. Ct. No. 23-____, complies with the word limitations, because it contains 8,992 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: November 27, 2023

Shay Dvoretzky