

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 23-

IRVIN HARRIS JOHNSON,

*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 6,692 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 January 12, 2023.

/s/ Jeffrey T. Green  
JEFFREY T. GREEN  
NORTHWESTERN SUPREME  
COURT PRACTICUM  
375 East Chicago Avenue  
Chicago, IL 60611  
(312) 503-1486  
jeff@greenlawchartered.com