

No. \_\_\_\_\_

---

IN THE  
**SUPREME COURT OF THE UNITED STATES**

---

ZACHARY SPIEGEL,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

---

**On Petition for Writ of Certiorari  
to the Eleventh Circuit Court of Appeals**

---

**CERTIFICATE OF COMPLIANCE WITH THE WORD LIMITATIONS**

---

I, Michael Ufferman, member of the Bar of this Court, pursuant to Rule 33.1(h), hereby certify that the Petition for Writ of Certiorari in the above-entitled case complies with the applicable word limitation. The number of words in the document is 4,560.

Respectfully submitted,

/s/ Michael Ufferman

MICHAEL UFFERMAN

Michael Ufferman Law Firm, P.A.

2022-1 Raymond Diehl Road

Tallahassee, Florida 32308

(850) 386-2345

FL Bar No. 114227

Email: ufferman@uffermanlaw.com

COUNSEL FOR THE PETITIONER