

No. _____

In the Supreme Court of the United States

MICHAEL RECH,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF COMPLIANCE WITH RULE 33(1)

The undersigned, a member of the Bar of this Court, hereby certifies pursuant to Supreme Court Rule 33(1)(h) that this Petition for Certiorari contains 4,895 words exclusive of those parts of the petition exempted by Supreme Court Rule 33(1)(d).

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

Dated: New York, NY
May 14, 2025



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