

In the Supreme Court of the United States

MANUEL ENRIQUE SANTANA,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Reply Brief for Petitioner contains 1,390 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,



Andrew J. Pincus