

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,

Respondent.

**On Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Bradley N. Garcia, a member of the bar of this Court, certify on this 29th day of April 2021, that the Motion for Leave to file Supplemental Brief After Oral Argument, and Supplemental Brief in the above-captioned case contains 831 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Bradley N. Garcia

Bradley N. Garcia