

No. 20-579

In the Supreme Court of the United States

ZIMMIAN TABB, PETITIONER,

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,995 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury the foregoing is true and correct. Executed on March 2, 2021.

/s John P. Elwood

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