

IN THE SUPREME COURT OF THE UNITED STATES

No.

MARTIN GOTTFELD, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Daniel L. Geyser, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 6,506 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel L. Geyser
Daniel L. Geyser

March 30, 2022