

NO. _____

IN THE UNITED STATES SUPREME COURT

MICHAEL HARRIS,

Petitioner,

v.

UNITED STATES OF AMERICA

Respondent.

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

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Forrest Leigh Wallace, a member of the Bar of this Court and an attorney, pursuant to Rule 33.1(h), hereby certifies that Petition for Writ of Certiorari complies with pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 3,696 words.

s/ Forrest L. Wallace
Forrest L. Wallace

May 22, 2026