## No. 18-1230 IN THE Supreme Court of the United States

JUAN ZAMUDIO, Petitioner, v.

UNITED STATES OF AMERICA, Respondent.

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,777 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2019.

Matthew S. Hellman