

No. _____

In the
Supreme Court of the United States
October Term, 2018

HUGO SANTANA-DONES,
Petitioner

v.

UNITED STATES OF AMERICA,
Respondent

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I hereby certify that the document contains 3,789 words.

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

Executed on June 27, 2019

/s/Karen A. Pickett

Karen A. Pickett