## IN THE SUPREME COURT OF THE UNITED STATES

No. 19-5410

CHARLES BORDEN, JR., PETITIONER

ν.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Erin P. Rust, counsel for petitioner, certify that the Brief for the Petitioner in the above-captioned case contains 12,549 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Erin P. Rust

April 27, 2020