

No._____

IN THE SUPREME COURT OF THE UNITED STATES
OCTOBER TERM, 2020

GIOVANNI COTTO,
Petitioner

v.

UNITED STATES OF AMERICA,

Respondent

CERTIFICATE OF WORD COUNT

I certify that the petition for a writ of certiorari filed on July 16, 2020, complies with the requirements of Rule 33(2)(b) and 33(1)(g)(i) of the Rules of the Supreme Court. The petition consists of 19 pages and 3,406 words, not counting those portions of the petition excluded in Rule 33(1)(d).

Dated: Buffalo, New York
 July 16, 2020

Respectfully submitted,

/s/Martin J. Vogelbaum
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