

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

TONY LAM,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF WORD COUNT

NOW COMES Assistant Federal Public Defender Samantha J. Kuhn, court-appointed counsel for Petitioner Tony Lam, and certifies as follows: As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,999 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.

Respectfully submitted this 31st day of July, 2020.

/s/ Samantha Kuhn
SAMANTHA J. KUHN
Assistant Federal Public Defender
Counsel of Record
Office of the Federal Public Defender
500 Poydras Street, Suite 318
Hale Boggs Federal Building
New Orleans, Louisiana 70130
(504) 589-7930
samantha_kuhn@fd.org