

No. _____

In the
Supreme Court of the United States
October Term, 2020

JOSE ANTONIO LUGO-GUERRERO,
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 5,003 words.

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

Executed on November 25, 2020.

/s/Karen A. Pickett

Karen A. Pickett