

IN THE SUPREME COURT OF THE UNITED STATES

No. 20-____

MICHAEL SANG HAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari in the above-entitled case contains 5,093 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.

Executed on November 13, 2020.

/s/ Kevin King

Kevin F. King

Counsel for Petitioner

Michael Sang Han