

No. 21-1576

IN THE
Supreme Court of the United States

TIMOTHY J. SMITH,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Motion for Leave to File and Brief of The Rutherford Institute, the Cato Institute, and the National Association for Public Defense as *Amici Curiae* in Support of Petitioner contain 293 and 5,224 words, respectively, and comply with the word limitations established by Rules 37.5 and 33.1(g)(x) of the Rules of this Court.

Dated: July 21, 2022

/s/ Michael Li-Ming Wong

Michael Li-Ming Wong