IN THE SUPREME COURT OF THE UNITED STATES

No. 22-196

ADAM SAMIA, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Kannon K. Shanmugam, counsel for petitioner and a member of the Bar of this Court, certify that the Brief for the Petitioner in the above-captioned case contains 12,540 words, excluding the portions that are exempted by Rule 33.1(d).

Kannon K. Shanmugam

January 25, 2023