

In the Supreme Court of the United States

PHIL LAMONT TRENT,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Paul W. Hughes, counsel for petitioner and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Reply Brief for Petitioner contains 2,992 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Sincerely,



Paul W. Hughes