

IN THE SUPREME COURT OF THE UNITED STATES

No. 18-1049

PETER M. HOFFMAN, MICHAEL P. ARATA,
AND SUSAN HOFFMAN, PETITIONERS

v.

UNITED STATES OF AMERICA, RESPONDENT.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

I, Amy Mason Saharia, counsel for amicus curiae National Association of Criminal Defense Lawyers ("Amicus Curiae"), and a member of the Bar of this Court, certify that the Brief for Amicus Curiae in Support of Petitioner in the above-captioned case contains 4841 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Amy Mason Saharia
Amy Mason Saharia

March 13, 2019