

No. 19-67

---

IN THE  
**Supreme Court of the United States**

---

UNITED STATES OF AMERICA,

*Petitioner,*

v.

EVELYN SINENENG-SMITH,

*Respondent.*

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the National Association of Criminal Defense Lawyers and the National Association of Federal Defenders as *Amici Curiae* in Support of Respondent in the above-captioned case contains 6,587 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).



Elliott Schulder  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
eschulder@cov.com  
(202) 662-6000

January 28, 2020