

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 Brief for The Rutherford Institute, the Cato Institute, and the National Association for Public Defense as *Amici Curiae* Supporting Petitioner contains 7,389 words and complies with the word limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: February 3, 2023

/s/ Michael Li-Ming Wong

Michael Li-Ming Wong