## IN THE SUPREME COURT OF THE UNITED STATES

No. 17-6577

RICHARD ARTHUR ORR,

v.

UNITED STATES OF AMERICA.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner contains 4,122 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2017.

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