

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

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THILO BROWN,  
*Petitioner,*

v.

UNITED STATES of AMERICA,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH WORD COUNT LIMITATIONS**

Petitioner Thilo Brown, through undersigned counsel, and pursuant to Sup. Ct. R. 29.2 and 28 U.S.C. § 1746, declares that the **Petition for Writ of Certiorari** filed in the above-styled matter complies with the type-volume limitation of Sup. Ct. R. 33.2(b). It contains 8919 words. Certification is based on the word count of the word-processing program used in preparing the petition, Microsoft Word 2016.

**FEDERAL DEFENDER OFFICE**

Respectfully Submitted By:



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