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February 5, 2018

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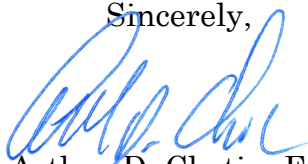
**RE: No. 17-950: ROSS WILLIAM ULBRICHT V. UNITED STATES OF AMERICA**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National Lawyers Guild, American Conservative Union Foundation Center for Criminal Justice Reform, FreedomWorks, Human Rights Defense Center, Nancy Gertner, National Coalition to Protect Civil Freedoms, Partnership for Civil Justice Fund, and People's Law Office as *Amici Curiae* in Support of Petitioner referenced above contains **5,454** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.  
Principal