19-161

IN THE

SUPREME COURT OF THE UNITED STATES

DEPARTMENT OF HOMELAND SECURITY, ET AL., Petitioners,

vs.

VIJAYAKUMAR THURAISSIGIAM, Respondent.

CERTIFICATE OF COMPLIANCE

As required by the Supreme Court Rule 33.1(h), I certify that the document contains 4528 words, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

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

Executed on the 16th day of December, 2019.

KENT S. SCHEIDEGGER 2131 L Street Sacramento, CA 95816 (916) 446-0345 Attorney for Amicus Curiae Criminal Justice Legal Foundation