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September 9, 2019

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: No. 19-169: JANE DOE V. IOWA

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Collateral Consequences Resource Center and Institute for Justice as *Amici Curiae* in Support of Petitioner referenced above contains **3,679** 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