IN THE SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA, Petitioner,)) No. 19-67
v. $ \begin{tabular}{ll} Evelyn Sineneng-Smith, \\ Respondent. \end{tabular}$	On Writ of <i>Certiorari</i> to the U.S. Court of Appeals for the Ninth Circuit
)

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.l(h), I certify that the "Brief Amicus Curiae of Immigration Law Reform Institute in Support of Petitioner" filed on behalf of the Immigration Law Reform Institute in the above-captioned matter contains 3,288 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 December 9, 2019.

/s/ Lawrence J. Joseph Lawrence J. Joseph

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