IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1650

CARLOS CONCEPCION,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Criminal Law Scholars contains 4,957 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d). I am a member of the Bar of this Court.

Dawinder S. Sidhu

November 22, 2021