IN THE SUPREME COURT of the UNITED STATES

RONRICO SIMMONS, JR.,
Petitioner,
v.
UNITED STATES OF AMERICA,
Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Sixth Circuit

BRIEF OF AMICUS CURIAE RIGHTS BEHIND BARS

CERTIFICATE OF COMPLIANCE (Word Count)

As required by Supreme Court Rule 33.1(h), I certify that the brief of *amicus curiae* Rights Behind Bars contains 4324 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.

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