

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 20-280

George Georgiou,

Petitioner,

v.

United States,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Brief of the National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner in the foregoing case contains 3,146 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 October 5, 2020.

/s/ Jeffrey T. Green
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