

**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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