IN THE

Supreme Court of the United States

MITCHELL J. STEIN,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE WITH RULE 33.1

As required by Supreme Court Rule 33.1(h), I certify that the **Brief of** *Amici* Curiae National Association for Public Defense, The Cato Institute, Due Process Institute, Innocence Project, and Americans for Prosperity Foundation in Support of Petitioner contains 5,633 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 13, 2020.

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