

IN THE
Supreme Court of the United States

No. 20-326

MITCHELL J. STEIN,
Petitioner,

v.

UNITED STATES OF AMERICA
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Center on the Administration of Criminal Law at NYU School of Law as *amicus curiae* in support of Petitioner in the above-entitled case contains 4,594 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.

/s/ Mark W. Mosier
Mark W. Mosier