

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

DZHOKHAR A. TSARNAEV,

Respondent.

On Writ of Certiorari to the United States
Court of Appeals for the First Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, William M. Jay, counsel of record and a member of the Bar of this Court, certify that the Brief for the National Fraternal Order of Police as *Amicus Curiae* Supporting Petitioner contains 5,553 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

June 21, 2021


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