

No.

IN THE SUPREME COURT OF THE UNITED STATES

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TONY BROWN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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**Certificate of Compliance**

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 2,690 words, excluding the parts 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 July 2, 2020.

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