

No. 20-559

IN THE
Supreme Court of the United States

JANE DOE,

Petitioner,

v.

UNITED STATES,

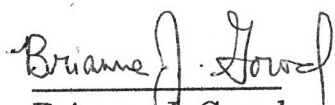
Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center and The Rutherford Institute as *Amici Curiae* in Support of Petitioner contains 5,764 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 November 30, 2020.



Brianne J. Gorod
Counsel for *Amici Curiae*