In the Supreme Court of the United States

ALEX CORI TRIBUE, *Petitioner*,

v.

UNITED STATES OF AMERICA, Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit

CERTIFICATE OF WORD COUNT

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December 9, 2020

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I HEREBY CERTIFY that Pursuant to Rule 33.1(h) of the Rules of this Court, the accompanying *amici curiae* brief was prepared using Century Schoolbook 12-point typeface and contains 4,373 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on Microsoft Word's word-count function.

I declare under penalty of perjury that the foregoing is true and correct.

December 9, 2020

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