

No. 20-6436

IN THE
Supreme Court of the United States

DANIEL LOVATO,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

I certify that the *Amicus Curiae Brief of Due Process Institute & The New Civil Liberties Alliance in Support of Petitioner* was prepared in compliance with Supreme Court Rule 33, as amended by the Court's April 15, 2020 Order in the above-captioned case, and further certify that it contains 4,187 words, excluding 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 the 22nd day of December 2020.



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