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May 27, 2022

Clerk
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Washington, D.C. 20002

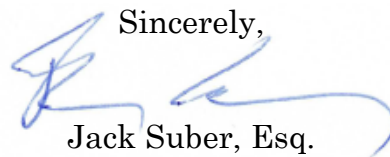
RE NO. 21-1394: JOHN FITISEMANU, ET AL. V. UNITED STATES, ET AL.

Dear Sir or Madam:

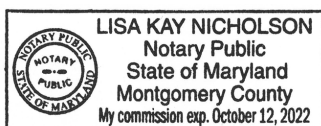
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Samoan Federation of America, Inc. referenced above contains **5,928** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 27th day of May 2022.

