In the Supreme Court of the United States

TIMOTHY J. SMITH, PETITIONER,

v.

UNITED STATES OF AMERICA

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Professor Drew L. Kershen and Professor Brian C. Kalt as Amici Curiae in Support of Petitioner contains 6,031 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 February 3, 2023.

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