

IN THE
Supreme Court of the United States

KEVIN BROWN,

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 COMPLIANCE

I certify that the Petition for Rehearing in *Brown v. United States*, No. 21-5060, contains 480 words and therefore complies with the word limitation in Supreme Court Rule 33.1(h).

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

EXECUTED on October 20, 2021.

Respectfully submitted,

A. Fitzgerald Hall, Esq.
Federal Defender

/s/ Conrad Kahn

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