

In The
Supreme Court of the United States

JAYREN JAKAR WYNN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

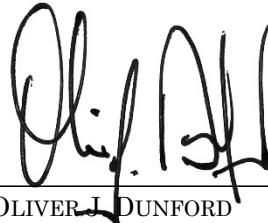
**On Petition for Writ of Certiorari
to the United States Court of Appeals
for the Second Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF PETITIONER contains 3,419 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 November 22, 2021.



OLIVER J. DUNFORD
Counsel of Record
CALEB KRUCKENBERG
Pacific Legal Foundation
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
Telephone: (916) 419-7111
ODunford@pacificlegal.org
CKruckenberg@pacificlegal.org

*Counsel for Amicus Curiae
Pacific Legal Foundation*