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February 11, 2022

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

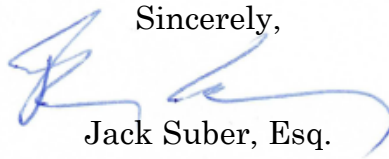
RE NO. 21-6826: TODD STANDS ALONE V. UNITED STATES

Dear Sir or Madam:

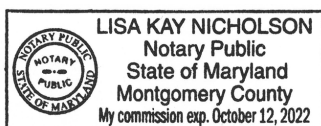
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Professors Stephen Smith, Hadar Aviram, John Burkoff, and the National Association of Criminal Defense Lawyers referenced above contains **4,676** words, excluding the parts of the document that are exempted by Supreme 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 11th day of February 2022.

