

No. 22-578

IN THE  
Supreme Court of the United States

RICHARD BEHAR,  
*Petitioner,*  
v.

UNITED STATES DEPARTMENT  
OF HOMELAND SECURITY,  
*Respondent.*

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

# **CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS**

I, Bruce D. Brown, counsel for amici curiae and a member of the Bar of this Court, certify that the Brief of Amici Curiae the Reporters Committee for Freedom of the Press and 21 Media Organizations in Support of Petitioner contains 3,165 words, excluding the parts of the brief that are exempted by Rule 33.1(d).