

No. 22-578

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IN THE  
Supreme Court of the United States

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RICHARD BEHAR,  
*Petitioner,*

v.

UNITED STATES DEPARTMENT  
OF HOMELAND SECURITY,  
*Respondent.*

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

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

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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).

Date: January 20, 2023

/s/ Bruce D. Brown