## No. 23-108

## In the Supreme Court of the United States

James E. Snyder

## Petitioner,

v. United States of America

Respondent.

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* James Madison Center for Free Speech contains 5,942 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 Friday, February 9, 2024.

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