

SUPREME COURT OF THE UNITED STATES

No. 19-783

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Nathan Van Buren,

Petitioner

v.

United States,

*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the brief contains 3,492 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 July 8, 2020



\_\_\_\_\_  
Marianna Iannotta

Sworn to and subscribed before me this 8<sup>th</sup> day of July, 2020.



\_\_\_\_\_  
**MARIA MAISONET**  
Notary Public State of New York  
No. 01MA6204360  
Qualified in Queens County  
Commission Expires Apr. 20, 2021

CP 295375