

In The  
**Supreme Court of the United States**

---

XIULU RUAN,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

---

**On Writ of Certiorari  
to the United States Court of Appeals  
for the Eleventh Circuit**

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PHYSICIANS AGAINST ABUSE IN SUPPORT OF PETITIONER (CORRECTED) contains 2,667 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 January 15, 2022.



---

SEBASTIAN OHANIAN, ESQ.  
*1 Alhambra Plaza, Suite 1225  
Coral Gables, FL 33134  
Tel: 786.369.5447  
sebastian@ohanianlegal.com  
Counsel for Amicus Curiae  
Physicians Against Abuse*