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September 7, 2021

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 20-303: UNITED STATES OF AMERICA V. JOSE LUIS VAELLO-MADERO

Dear Sir or Madam:

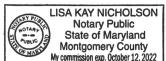
As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae Public Benefits Scholars referenced above contains 7,982 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Jack Suber, Esq.

Principal



LISA KAY NICHOLSON | Sworn and subscribed before me this 7th day of September 2021.

Sig K Michalson