

No. 20-443

IN THE
Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

DZHOKHAR A. TSARNAEV,

Respondent.

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

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 5th day of November, 2020, that the Brief for the National Fraternal Order of Police as Amicus Curiae Supporting Petitioner contains 4,946 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ William M. Jay _____

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November 5, 2020