

May 27, 2022

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

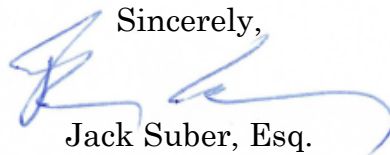
RE NO. 21-1394: JOHN FITISEMANU, ET AL. V. UNITED STATES, ET AL.

Dear Sir or Madam:

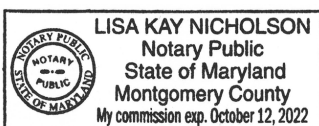
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Samoan Federation of America, Inc. referenced above contains **5,928** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



RUD ☐ 00000RUBW ☐ DBI ☐ 0D ☐

