

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 21-1394

JOHN FITISEMANU, *et al.*,

Petitioners,

v.

UNITED STATES OF AMERICA, *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Steven J. Horowitz, certify that the Brief of Citizenship Scholars as *Amici Curiae* in Support of Petitioners in the foregoing case contains 5,972 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 May 31, 2022.

/s/ Steven J. Horowitz
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