

No. 21-541

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IN THE  
Supreme Court of the United States

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TRAVIS TUGGLE,  
*Petitioner,*

v.

UNITED STATES OF AMERICA.,  
*Respondent.*

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On Petition for a Writ of Certiorari to the  
United States Court of Appeals for the 7<sup>th</sup> Circuit

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**CERTIFICATE OF COMPLIANCE WITH  
WORD-COUNT LIMITATIONS**

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I, Bruce D. Brown, counsel for amici curiae and a member of the Bar of this Court, certify that the Brief of the Reporters Committee for Freedom of the Press and 15 Media Organizations in Support of Petitioner contains 4,346 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Date: November 11, 2021      /s/ Bruce D. Brown