

No. 22-179

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IN THE  
Supreme Court of the United States

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UNITED STATES,

*Petitioner,*

v.

HELAMAN HANSEN,

*Respondent.*

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On Writ of Certiorari to the United States  
Court of Appeals for the 9th Circuit

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

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I, Bruce D. Brown, counsel for amicus curiae and a member of the Bar of this Court, certify that the Brief of Amicus Curiae the Reporters Committee for Freedom of the Press in Support of Respondent contains 3,302 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Date: February 23, 2022

/s/ Bruce D. Brown