## IN THE SUPREME COURT OF THE UNITED STATES

No. 17-7046

Chenequa Austin and Eric Jermaine Spivey, Petitioners,

v.

United States of America, Respondent.

## CERTIFICATE OF COMPLIANCE WITH RULE 33.1(g)

I, Daniel E. Jones, counsel for the Florida Association of Criminal Defense Lawyers, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of the Florida Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioners consists of 4,439 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).

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