## CERTIFICATE OF COMPLIANCE

## No. 23-1072

## Ali Hamza Suliman Al Bahlul

Petitioner,

υ.

## United States,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the amicus brief contains 5,740 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 2, 2024

/s/ Brenner Fissell
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