

No. 23-583

Amina Bouarfa,

v.

Alejandro Mayorkas,

Secretary of Homeland Security, *et al.*,

CERTIFICATE OF COMPLIANCE

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify that the attached *Amicus Brief of Thomas Ogden* contains no more than 1,500 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Thomas Ogden

Thomas Fuller Ogden, Esq.

August 28, 2024