IN THE Supreme Court of the United States

No. 23-909

v.

UNITED STATES OF AMERICA,

Respondent.

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

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief of The National Association of Criminal Defense Lawyers and The Cato Institute as *Amici Curiae* in Support of Petitioners contains 3,236 words, excluding parts of the document that are exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 26, 2024.

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