No. 21-1436

IN THE Supreme Court of the United States

LEON SANTOS-ZACARIA,

Petitioner,

v.

MERRICK GARLAND, U.S. ATTORNEY GENERAL,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center & National Immigration Litigation Alliance as *Amici Curiae* in Support of Petitioner contains 6,235 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 November 23, 2022.

Brianne Aow

Brianne J. Gorod Counsel for *Amici Curiae*