IN THE

Supreme Court of the United States

SYLVIA GONZALEZ,

Petitioner,

v.

EDWARD TREVINO, II, ET AL.,

Respondents.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Constitutional Accountability Center and the Institute for Constitutional Advocacy and Protection as *Amici Curiae* in Support of Petitioner contains 7,647 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 December 18, 2023.

Brian R. Frazelle

Counsel for Amici Curiae

Brion Frazelle