IN THE
SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA, *Petitioner,* v. HELAMAN HANSEN, *Respondent.*	))))))))	No. 22-179 On Writ of *Certiorari* to the U.S. Court of Appeals for the Ninth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.l(h), I certify that the "Brief *Amicus Curiae* of Immigration Law Reform Institute in Support of Petitioner" filed on behalf of the Immigration Law Reform Institute in the above-captioned matter contains 2,947 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 January 25, 2023.

/s/ Lawrence J. Joseph

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