## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-179

UNITED STATES,

Petitioner,

v.

## HELAMAN HANSEN,

## Respondent.

As required by Supreme Court Rule 33.1(h), I, Stephen R. Sady, certify that the **corrected** amicus brief in the foregoing case contains 7,962 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 February 27, 2023.

## /S/ Stephen R. Sady

STEPHEN R. SADY
Amicus Committee
National Association
Of Federal Defenders
OREGON FEDERAL PUBLIC
DEFENDER'S OFFICE
101 S.W. Main Street
Suite 1700
Portland, OR 97204
(503) 326-2123
Steve\_Sady@fd.org