

**CERTIFICATE OF COMPLIANCE**

No. 22-721

DAMIAN MCELRATH,

*Petitioner,*

v.

GEORGIA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* National Association of Criminal Defense Lawyers, American Civil Liberties Union, and American Civil Liberties Union of Georgia in Support of Petitioner contains 7,690 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

Executed on September 5, 2023.

*Donna J. Moore*  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant on the date designated below.

Date: *September 5, 2023*  
*John D. Gallagher*  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028