

CERTIFICATE OF COMPLIANCE

No. 22-7386

LOUIS MCINTOSH,

Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of National Association of Criminal Defense Lawyers in Support of Petitioner contains 3,799 words, excluding the parts of the Brief *Amicus Curiae* 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 4, 2023.



Steven L. Kessler
