

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of *Amicus Curiae* Drug Policy Alliance in Support of Petitioner in *Keith L. Carnes v. United States of America* (No. 22-76) complies with the word count limitations of Supreme Court Rule 33.1(h) in that it contains 5,187 words, based on the word-count function of Microsoft Word 2019, including footnotes and excluding material not required to be counted under Supreme Court Rule 33.1(d).

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