



CERTIFICATE OF COMPLIANCE

No. 23-636

ATIF AHMAD RAFAY,

Petitioner,

v.

ERIC JACKSON,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Criminal Lawyers' Association of Ontario, Canada as Amicus Curiae contains 5,380 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 December 26, 2023.

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

Date: December 26, 2023

John D. Gallagher
Notary Public

[seal]



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