In the Supreme Court of the United States

KENNETH WENDELL RAVENELL Petitioner,

υ.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Amici Curiae National Association of Criminal Defense Attorneys and Maryland Criminal Defense Attorneys' Association in Support of Petitioner Kenneth Wendell Ravenell's Petition for Writ of Certiorari in *Kenneth Wendell Ravenell v. United States*, S. Ct. No. 23-638, complies with the word limitations, because it contains 4670 words, excluding the parts of the document exempted by Rule 33.1(d).

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

Dated: January 12, 2024

Jeffrey N. Rosenthal