



CERTIFICATE OF COMPLIANCE

No. 23-953

BRANDON MICHAEL COUNCIL,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Brief as *Amicus Curiae* and Brief for *Amicus Curiae* National Association for Public Defense in Support of Petitioner contains 3,413 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 April 1, 2024.

Donna J. Moore

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

Date: April 1, 2024

John D. Gallagher
Notary Public

[seal]



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