No. 24-482

IN THE Supreme Court of the United States

HOLSEY ELLINGBURG, JR.,

v.

UNITED STATES OF AMERICA,

Respondent.

Petitioner,

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 5,323 words, excluding the parts of the document 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 June 30, 2025.

Brianne J. How

Brianne J. Gorod Counsel for *Amicus Curiae*