IN THE

Supreme Court of the United States

CARLOS CONCEPCION,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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 6,097 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 November 22, 2021.

Brianne J. Gorod

Counsel for Amicus Curiae