

IN THE  
**Supreme Court of the United States**

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LEON SANTOS-ZACARIA,

*Petitioner,*

v.

MERRICK B. GARLAND, Attorney General,

*Respondent.*

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**On Writ of Certiorari to the United States  
Court of Appeals for the Fifth Circuit**

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**BRIEF OF *AMICI CURIAE* FORMER IMMIGRATION  
JUDGES AND FORMER MEMBERS OF  
THE BOARD OF IMMIGRATION APPEALS  
IN SUPPORT OF NEITHER PARTY**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,548 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.

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Executed on November 23, 2022.

  
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Alan James Smith  
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