

No. 22-340

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

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MARK E. PULSIFER,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of FAMM, American Civil Liberties Union, and National Association of Criminal Defense Lawyers as *Amici Curiae* in Support of Petitioner contains 6,769 words and complies with the word limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: May 26, 2023

*/s/ David Debold*

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David Debold