



CERTIFICATE OF COMPLIANCE

No. 22-340

MARK E. PULSIFER,

Petitioner,

v.

UNITED STATES OF AMERICA,

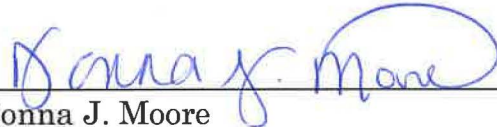
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Professors Thomas R. Lee, Kevin Tobia, and Jesse Egbert in Support of Neither Party contains 6,711 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.

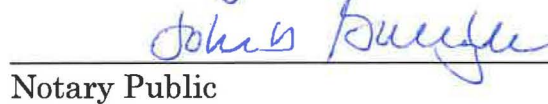
Executed on May 26, 2023.



Donna J. Moore
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(800) 890-5001

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

Date: May 26, 2023


Notary Public

[seal]



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