

IN THE
Supreme Court of the United States

JUSTIN RASHAAD BROWN
Petitioner,

v.

UNITED STATES,
Respondent.

EUGENE JACKSON
Petitioner,

v.

UNITED STATES,
Respondent.

**On Writs of Certiorari to the
United States Court of Appeals
for the Third and Eleventh Circuits**

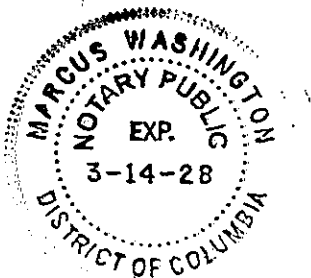
**Brief of the National Association of Federal Defenders
as *Amici Curiae* in Support of Petitioners**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,815 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.

Sworn to and subscribed before me this 19th day of July 2023.



A handwritten signature in black ink, appearing to be "MWA", written over a horizontal line.

MARCUS WASHINGTON
NOTARY PUBLIC
District of Columbia

My commission expires March 14, 2028.