

No. 23-370

IN THE
Supreme Court of the United States

PAUL ERLINGER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Court-Appointed *Amicus Curiae* in Support of the Judgment Below complies with the applicable word limitations because it contains 12,984 words, excluding the parts of the document exempted by Supreme Court Rule 33.1(d).

Dated: February 2, 2024

/s/ Nick Harper

Nick Harper