No. 25-112

In The Supreme Court of the United States

OKELLO T. CHATRIE,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amicus Curiae of the American Center for Law and Justice in Support of Neither Party complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 5,652 words.

/s/ Jay Alan Sekulow
Jay Alan Sekulow

March 9, 2026