IN THE

Supreme Court of the United States

ERIK HARRIS, PETITIONER,

v.

UNITED STATES

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

BRIEF OF PROFESSOR JOEL S. JOHNSON AS AMICUS CURIAE SUPPORTING PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,273 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 14th day of October 2025.

AZA SALINDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.

